

Internal Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Policy of dotabee.com

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1. Purpose

This policy outlines Aquila Ltd's commitment to preventing money laundering (ML), terrorist financing (TF), and other financial crimes. It ensures compliance with the laws of Anjouan, including the Anti-Money Laundering and Counter-Terrorism Financing Act, and aligns with international standards such as the Financial Action Task Force (FATF) recommendations.

2. Scope

This policy applies to all directors, employees, contractors, and partners involved in the operations of Aquila Ltd. It covers all aspects of our online gambling operations, including customer onboarding, transactions, and third-party relationships.

3. Key Objectives

- Detect, prevent, and report ML and TF activities.
- Establish robust customer due diligence (CDD) and enhanced due diligence (EDD) measures.
- Maintain ongoing monitoring of customer accounts and transactions.
- Ensure timely reporting of suspicious activities to the Financial Intelligence Unit (FIU) of Anjouan.
- Provide regular training to all employees on AML/CTF obligations.

4. AML/CTF Compliance Officer

Aquila Ltd. will appoint an AML/CTF Compliance Officer who will:-

- Develop, implement, and oversee the AML/CTF program.
- Act as the primary point of contact with the Anjouan Gaming Authority and FIU.
- File suspicious transaction reports (STRs) and currency transaction reports (CTRs).
- Conduct regular reviews of the AML/CTF framework.

5. Customer Due Diligence (CDD)

Aquila Ltd. will apply the following measures:-

- **Identity Verification:** Obtain and verify the customer's identity using reliable, independent sources (*e.g., government-issued ID*).
- **Risk Assessment:** Categorize customers as low, medium, or high risk based on their profiles and activities.
- **Verification of Beneficial Owners:** For corporate clients, identify and verify beneficial owners holding a 25% or greater interest.

Enhanced Due Diligence (EDD) will be applied for:-

- High-risk customers (*e.g., Politically Exposed Persons*).
- Customers from high-risk jurisdictions.
- Unusual or suspicious transactions.

6. Transaction Monitoring

- Implement automated systems to monitor transactions for unusual patterns, large sums, or activities inconsistent with customer profiles.
- Maintain transaction records for at least seven (7) years to comply with Anjouan laws.

7. Suspicious Transaction Reporting

- Report all suspicious activities promptly to the FIU using the prescribed forms.
- Ensure confidentiality of STR submissions to protect the integrity of investigations.

8. Record-Keeping

- Maintain detailed records of customer onboarding, transactions, and reporting for seven (7) years.
- Ensure records are accessible for regulatory audits and investigations.

9. Training and Awareness

Provide mandatory AML/CTF training for all employees, including:-

- Identifying red flags for ML and TF.
- Reporting obligations and procedures.

- Updates on regulatory changes and global best practices.
- Conduct refresher training at least annually.

10. Independent Audit

- Engage external auditors to review the effectiveness of the AML/CTF program annually.
- Implement recommendations from audit findings to strengthen compliance.

11. Penalties for Non-Compliance

Non-compliance with AML/CTF obligations will result in:-

- Disciplinary action, including termination of employment for employees.
- Reporting to regulatory authorities for potential criminal or civil penalties.

12. Policy Review

This policy will be reviewed and updated annually or as required by changes in laws, regulations, or business practices.