

FINANCIAL CRIME RISK STATEMENT

RAK ICC and its directors and other senior management are committed to carrying out its activities in compliance with all applicable laws, rules and regulations and to maintaining the highest ethical standards in relation to its business activities.

RAK ICC's anti-money laundering ("**AML**"), countering terrorist financing ("**CTF**") and sanctions compliance policies, controls and procedures (the "**Financial Crime Compliance Programme**") aim to ensure that any risks identified are recognised and mitigated.

FINANCIAL CRIME RISK STATEMENT

RAK ICC has established and maintains the Financial Crime Compliance Programme to prevent and detect money laundering and terrorist financing, which ensures compliance with UAE Federal laws and takes into consideration international best practice.

RAK ICC does not conduct or permit any person to use RAK ICC to conduct illegal activity. RAK ICC will therefore not register any entity where customer due diligence ("**CDD**") cannot be satisfactorily completed, or where there is knowledge or reasonable grounds to suspect that the entity/applicant is engaged in money laundering or terrorist financing.

RAK ICC's Financial Crime Compliance Programme defines the minimum standards which must be complied with, including but not limited to:

- The appointment of a Chief Compliance Officer who is the custodian of the Financial Crime Compliance Programme;
- Conducting CDD by collecting relevant information and records on RAK ICC entities/applicants (and keeping such records up to date) including any person who is applying for or renewing a registration in RAK ICC (collectively "**Clients**");
- Conducting enhanced due diligence on customers assessed as higher risk under the Financial Crime Compliance Programme;
- Identifying and reporting any knowledge or suspicion of money laundering to the Financial Intelligence Unit of the Central Bank; and
- An ongoing anti-money laundering, counter terrorist financing and Sanctions training programme, which must be attended by all relevant employees.

SANCTIONS POLICY STATEMENT

RAK ICC is committed to fully complying with all sanctions laws and regulations of the United Arab Emirates, United Nations, United States and European Union (including the United Kingdom), as well as other such laws and regulations, when applicable to its business (collectively, "**Sanctions**").

RAK ICC shall not register any entity that is, to the best of its knowledge, designated, or whose shareholders, beneficial owners, directors or managers are designated as targets of Sanctions. In addition, RAK ICC shall not conduct, or allow Clients to use RAK ICC to conduct business with any individual, entity, vessel, country or territory that is a target of Sanctions unless RAK ICC has first ensured that such business complies with applicable law and does not involve any sanctionable activity. RAK ICC will also not participate in transactions designed or intended to evade applicable Sanctions.

RAK ICC's Financial Crime Compliance Programme defines the minimum standards which must be complied with, including but not limited to:

- Collecting sufficient background information from applicants at the time of registration, and refreshing this information at the time of renewal, to determine if they are ineligible for registration or renewal based on the Financial Crime Compliance Programme or if they are otherwise high-risk under Sanctions;
- Before registering any new Clients to operate in RAK ICC, renewing a registration or engaging in significant transactions with introducers or other agents or counterparties, conducting screening;
- Prohibiting business activity, including prohibitions on commencing or continuing customer relationships or providing products or services or facilitating transactions that RAK ICC believes may violate applicable Sanctions laws or RAK ICC's Financial Crime Compliance Programme;
- Reporting breaches of Sanctions laws to the relevant regulatory authority. This can include any attempt to evade Sanctions laws; and
- An ongoing anti-money laundering, counter terrorist financing and Sanctions training programme, which must be attended by all relevant Employees.