

# ANTI-MONEY LAUNDERING POLICY

"Money laundering" is the practice of executing a series of financial transactions to conceal the ownership, source, control or destination of illegally gained money. Further, ML is the process by which the proceeds of criminal or terrorist activity are made to appear to legitimate the origin of the said monies.

LQD is committed to preventing money laundering through our service and compliance procedures.

## IMPLEMENTED PROCEDURES

LQD aims to continue to implement its strict anti-laundering policy to ensure that our customers will be identified for such suspicion up to a certain standard to minimise the procedural complications for genuine and legitimate customers.

In order to fulfil its commitment to provide full assistance to the government in combating such illegal financial transactions, LQD follows strict compliance procedures which verify its clients' identification.

LQD LLC should retain the original or a scanned copy/photocopy of documents used to identify and verify Account holders/beneficiaries, in addition to a record of other information (e.g. results of name screening) obtained in the course of completing the due diligence process.

LQD stores a detailed record of all previous financial transactions matching the client in case of any needed investigation and ensures the continuity of the transactions.

LQD is obliged to report suspicious transactions. You may face criminal prosecution for misusing the service as we are bound to report such behaviour to the authorities automatically.

As one of the primary measures to discourage money laundering and related illegal activities, LQD doesn't accept cash transactions whether you are intended to deposit or withdraw the fund.

The Company reserves the right to suspend or refuse to process a transaction at any stage where it believes it is connected to money laundering, criminal activity, or third-party funding.

In accordance with international law, the Company is not obliged to inform the Client that it has reported to the corresponding bodies the Client's suspicious activity.

## THIRD-PARTY TRANSACTIONS

LQD LLC should not accept or agree to third-party transactions. Since third-party transactions are prohibited, when detected will be returned to the beneficiary.

“Third-party transactions” refer to transactions where LQD LLC receives funds from or is asked to remit funds to a third party other than the Account holder, beneficiary or partner on whom LQD LLC has undertaken its due diligence.

Examples include:

- (a) LQD LLC is requested by a beneficiary or partner to whom it has agreed to provide funds to remit those funds to a third party instead; or
- (b) LQD LLC unexpectedly receives funds from a third-party payor/account instead of directly from the Account holder.

## **COMPLIANCE REGIME**

LQD has set up a compliance regime to fulfil its formal legal requirement. It comprises the appointment of a compliance officer, policy making, and regular implementation review.

## **COMPLIANCE OFFICER (CO)**

LQD LLC’s designated compliance officer is Natalie Bianchi.

The CO acts as the focal point within LQD LLC to oversee all activities relating to the prevention and detection of ML/TF.

The CO shall provide support and guidance to LQD LLC Individuals to ensure that ML/TF risks are adequately managed.

The CO is responsible for developing and/or continuously reviewing LQD LLC’s AML compliance framework (including this Policy) to ensure it remains up-to-date, effective and consistent with current statutory and regulatory requirements and reflects the risk profile of LQD LLC’s Account holder/beneficiary.

CO is also committed to regularly providing training for its employees on enhancements to anti-money laundering procedures that may be required in accordance with international law.

## **MONEY LAUNDERING REPORTING OFFICER (MLRO)**

LQD LLC’s CO is also its designated money laundering reporting officer (“MLRO”).

Any LQD LLC Individual having knowledge or suspicion of money laundering must disclose that development to the MLRO.

The MLRO should play an active role in identifying and reporting suspicious transactions.

The MLRO shall review all internal reports from LQD LLC Individuals and, in light of all available relevant information, determine whether or not there is an ML case.

## **TRAINING OF INDIVIDUALS**

All LQD LLC Individuals, in particular those who deal with Account holders/beneficiaries directly, must:

- (a) Receive a copy of this Policy and confirm in writing on an annual basis that they have read and understood it; and
- (b) Trained for any and all AML procedures as advised by the CO as soon as possible after the commencement of their work with LQD LLC and get updated on any changes regularly.