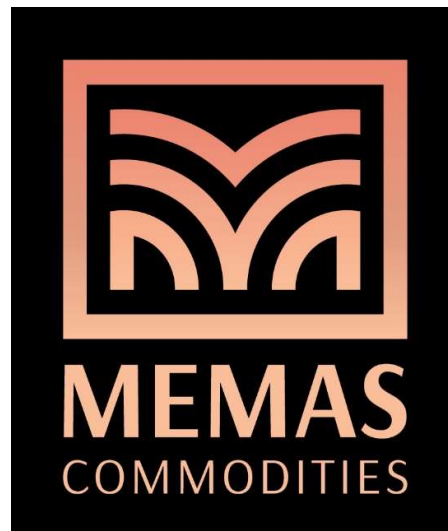


MEMAS COMMODITIES DMCC

Customer Due Diligence Process

Updated Version Rev 04.05A.2021



Customer Due Diligence Policy and Procedure

Based on the Cabinet Decision No. (10) of 2019 Concerning the implementing regulation of decree law no. (20) of 2018 On anti- money laundering and combating the financing of terrorism and illegal organizations.

Customer Due Diligence (CDD): Process of identifying or verifying the information of a customer or Beneficial Owner, whether a natural or legal person or a legal arrangement, and the nature of its activity and the purpose of the business relationship and the ownership structure and control over it for the purposes of the Decretal-Law and this Decision

As per section 3 of Article 5:

Memas Commodities DMCC will undertake CDD measures to verify the identity of the Customer and the Beneficial Owner before or during the establishment of the business relationship or opening an account, or before executing a transaction for a customer with whom there is no business relationship. And in the cases where there is a low crime risk, it is permitted to complete verification of Customer identity after establishment of the business relationship, under the following conditions:

- (a) The verification will be conducted in a timely manner as of the commencement of business relationship or the implementation of the transaction.
 - (b) The delay is necessary in order not to obstruct the natural course of business.
 - (c) The implementation of appropriate and effective measures to control the risks of the Crime.
2. Memas Commodities DMCC will take measures to manage the risks in regard to the circumstances where Customers are able to benefit from the business relationship prior to completion of the verification process.

As per section 3 of Article 6

Memas Commodities DMCC undertakes CDD measures in the following cases:

1. Establishing the business relationship.
2. Carrying out occasional transactions in favour of a customer for amounts equal to or exceeding AED 55,000, whether the transaction is carried out in a single transaction or in several transactions that appear to be linked.
3. Carrying out occasional transactions in the form of Wire Transfers for amounts equal to or exceeding AED 3,500.
4. Where there is a suspicion of the Crime.

Where there are doubts about the veracity or adequacy of previously obtained Customer's identification data.

As per section 3 of Article (7)

Memas Commodities DMCC will undertake CDD measures and ongoing supervision of business relationships, including:

1. Audit transactions that are carried out throughout the period of the business relationship, to ensure that the transactions conducted are consistent with the information they have about Customer, their type of activity and the risks they pose, including - where necessary - the source of funds
2. Ensure that the documents, data or information obtained under CDD Measures are up-to-date and appropriate by reviewing the records, particularly those of high-risk customer categories

As per section 3 of Article (8)

1. Memas Commodities DMCC will identify the Customer's identity, whether the Customer is permanent or walk-in, and whether the Customer is a natural or legal person or legal arrangement and verify the Customer's identity and the identity of the Beneficial Owner. This should be done using documents, data or any other identification information from a reliable and independent source as follows:

(a) For Natural Persons:

The name, as in the identification card or travel document, nationality, address, place of birth, name and address of employer, attaching a copy of the original and valid identification card or travel document, and obtain approval from the senior management, if the Customer or the Beneficial Owner is a PEP.

(b) For Legal Persons and Legal Arrangements:

- (1) The name, Legal Form and Memorandum of Association
 - (2) Headquarter office address or the principal place of business; if the legal person or arrangement is a foreigner, it must mention the name and address of its legal representative in the State and submit the necessary documents as a proof.
 - (3) Articles of Association or any similar documents, approved by the relevant authority within the State.
 - (4) Names of relevant persons holding senior management positions in the legal person or legal arrangement.
2. Memas Commodities DMCC will verify that any person purporting to act on behalf of the Customer is so authorized and verify the identity of that person as prescribed in Clause (1), of this Article.
 3. Memas Commodities DMCC will understand the intended purpose and nature of the business relationship, and obtain, when necessary, information related to this purpose.
 4. Memas Commodities DMCC will understand the nature of the Customer's business as well as the Customer's ownership and control structure.

As per section 3 of Article (9)

Memas Commodities DMCC will take reasonable measures to identify the Beneficial Owners of legal persons and Legal Arrangements and verify it, by using information, data, or documents acquired from a reliable source, by the following:

1. For Customers that are legal persons:

- (a) Obtaining and verifying the identity of the natural person, who by himself or jointly with another person, has a controlling ownership interest in the legal person of 25% or more, and in case of failing or having doubt about the information acquired, the identity shall be verified by any other means.
- (b) In the event of failing to identify the natural person exercising control as per paragraph (a) of this Clause, or the person(s) with the controlling ownership interest is not the Beneficial Owner, the identity shall be identified for the relevant natural person(s) holding the position of senior management officer, whether one or more persons.

2. For Customers that are Legal Arrangements:

Verifying the identity of the Settlor, the Trustee(s), or anyone holding a similar position, the identity of the beneficiaries or class of beneficiaries, the identity of any other natural person exercising ultimate effective control over the legal arrangement and obtaining sufficient information regarding the Beneficial Owner to enable the verification of his/her identity at the time of payment, or at the time he/she intends to exercise his/her legally acquired rights.

As per section 3 of Article (10)

Memas Commodities DMCC shall be exempted from identifying and verifying the identity of any shareholder, partner, or the Beneficial Owner, if such information is obtainable from reliable sources where the Customer or the owner holding the controlling interest are as follow:

1. A company listed on a regulated stock exchange subject to disclosure requirements through any means that require adequate transparency requirements for the Beneficial Owner.
2. A subsidiary whose majority shares or stocks are held by the shareholders of a holding company.

Section 3 of Article (11)- Not Applicable to Memas Commodities DMCC

As per section 3 of Article (12)

Memas Commodities DMCC shall apply CDD measures to Customers and the ongoing business relationship on the effective date of the present Decision, within such times as deemed appropriate based on relative importance and risk priority. It should also ensure the sufficiency of data acquired, in case CDD measures were applied before the effective date of the present Decision.

As per section 3 of Article (13)

Memas Commodities DMCC is prohibited from establishing or maintaining a business relationship or executing any transaction should they be unable to undertake CDD measures towards the Customer and should consider reporting a suspicious transaction to the FIU.

Even if Memas Commodities DMCC suspect the commission of a Crime, Memas Commodities DMCC should not apply CDD measures if they have reasonable grounds to believe that undertaking such measures would tip-off the Customer and they should report a Suspicious Transaction to the FIU along with the reasons having prevented them from undertaking such measures.

As per section 3 of Article (14)

Memas Commodities DMCC will commit to the following:

1. Memas Commodities DMCC will Not deal in any way with Shell Banks, whether to open bank accounts in their names, or to accept funds or deposits from them.
2. Memas Commodities DMCC will Not create or keep records of bank accounts using pseudonyms, fictitious names or numbered accounts without the account holder's name.

List of Documents Memas Commodities DMCC

The list of documents that we collect from our customer and suppliers are listed below these documents are used to conduct the customers and suppliers' due diligences.

1. Trade License Copy
2. Office Tenancy Contract
3. Memorandum of Association & Certificate of Incorporation
4. Passport, Visa, and Emirates I.D of all Partners.
5. Home Address of All Partners (Utility/Tenancy)
6. TRN Certificate
7. Account Opening Form
8. Supplier Code of Ethics Form
9. AML and CTF Policy of the Company.
10. Financial Copy of the Company
11. Supply Chain Policy

