



## **Dupoin Anti-Money Laundering (AML) Policy**

### **Scope of Policy**

This policy applies to all officers, employees, and appointed producers of Dupoin, as well as the products and services offered by the company. Dupoin is committed to preventing money laundering and terrorist financing by ensuring cooperation across all business units to comply with applicable laws. The AML Compliance Committee is responsible for investigating suspicious activities and making the necessary reports to law enforcement or regulatory agencies.

### **Policy**

Dupoin aims to prevent money laundering and any activity related to criminal or terrorist funding. Money laundering is defined as concealing or disguising criminal proceeds to make them appear legitimate. Dupoin will adhere to all relevant laws and requires all employees to help prevent money laundering through vigilant monitoring and reporting.

### **What is Money Laundering?**

Money laundering involves exchanging criminally obtained money or assets for “clean” money, with no visible link to their criminal origins. This includes using illicit funds for legitimate investments, acquiring property, or conducting financial transactions to disguise the illegal source of funds.

### **The money laundering process occurs in three stages:**

1. Placement: Moving illegal funds into the financial system.
2. Layering: Conducting transactions to obscure the origin of the funds.
3. Integration: The funds are now “clean” and can be freely used.



## **What is Counter-Terrorist Financing (CTF)?**

CTF refers to the act of funding terrorism or terrorist organizations. Even if the funds are not from criminal activity, it's crucial to ensure that Dupoin's services are not used for terrorism financing.

## **Risk-Based Approach**

Dupoin follows a risk-based approach to AML procedures. The resources spent on due diligence are proportional to the level of risk associated with each client, which is assessed based on customer profiles, products offered, and geographic location. The risk can be categorized into:

- Customer Risk: Based on client behavior and financial profile.
- Product Risk: The nature of the products or services being used.
- Country Risk: The geographical risk associated with the client or transaction.

## **Customer Identification Program (CIP)**

Dupoin will verify the identity of all clients by collecting essential personal information. This includes details such as full name, address, and occupation. For higher-risk transactions, further verification may be required. The standard identification process will ensure confidence in the client's legitimacy and help prevent fraudulent activity.

## **Know Your Customer (KYC)**

KYC procedures involve collecting and verifying information about clients to ensure their activities align with their financial profiles. This helps identify any suspicious activities early on. High-risk clients or transactions may be subject to enhanced scrutiny.

## **Source of Funds**

Dupoin requires clients to disclose the source of their funds for all transactions. This is to ensure that funds are not derived from criminal activities.



## **Monitoring and Reporting**

Dupoin will monitor all transactions to identify suspicious activity. If a transaction raises concerns, further investigation will be conducted, and a Suspicious Activity Report (SAR) will be filed if necessary. These activities will be documented, and all employees are required to cooperate in identifying potential money laundering or terrorist financing schemes.

## **Suspicious Activity**

Signs of suspicious activity, known as "red flags," include:

- Reluctance to provide identity verification.
- Transactions inconsistent with the customer's known business.
- Unusual or large deposits and withdrawals without a clear business purpose.
- Frequent wire transfers to unrelated third parties.

If any of these red flags are detected, further due diligence will be performed. If no legitimate explanation is found, the activity will be reported to the AML Compliance Committee.

## **Investigation and Reporting**

Once suspicious activity is reported, the AML Compliance Committee will investigate and, if necessary, file a SAR with law enforcement or regulatory bodies. Investigations are confidential, and no information regarding the investigation will be disclosed.

## **Freezing of Accounts**

If criminal or fraudulent activity is suspected, Dupoin reserves the right to freeze accounts until the issue is resolved.