

 SAKSOFT <small>your digital transformation partner</small> SAKSOFT LIMITED	Anti-Money Laundering Policy	Doc. No: ESG/AML/01
	Department: CFO	Issue 01; Rev. No : 00

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1. Purpose

The purpose of this Anti-Money Laundering (AML) Policy is to establish Saksoft's commitment to preventing money laundering and terrorist financing. This policy sets out procedures and controls designed to prevent Saksoft's services and operations from being used to conceal or legitimize illegally obtained funds, in compliance with applicable laws and regulations.

2. Scope

This policy applies to all Saksoft employees, contractors, partners, and third-party service providers globally. It covers all operations, services, and transactions conducted by or on behalf of Saksoft.

3. References

- Financial Action Task Force (FATF) Guidelines
- EU Anti-Money Laundering Directives
- Applicable Local AML Legislation and Regulations
- Saksoft Code of Conduct

4. Definitions

- **Money Laundering:** The process of concealing the origins of illegally obtained money to make it appear legal.
- **Terrorist Financing:** The provision of financial support to terrorist activities or organizations.
- **Know Your Customer (KYC):** Procedures for verifying customer identity and assessing potential risk.
- **Politically Exposed Person (PEP):** An individual with a prominent public function, which may present a higher risk of exposure to corruption and financial crime.


5. Roles and Responsibilities

- **Board of Directors:** Provide oversight and ensure commitment to AML compliance.
- **CFO:** Develop and manage the AML program, monitor adherence, and report AML risks and incidents.
- **Employees:** Follow AML policies, report suspicious activities, and participate in AML training.
- **Third-Party Service Providers:** Must adhere to Saksoft's AML standards, providing necessary documentation and cooperation.

6. Policy Provisions

6.1 Commitments to Prevent Concealment of Illegally Obtained Money

Saksoft is dedicated to preventing the concealment of illegally or dishonestly obtained money within legitimate economic activities. The policy includes both qualitative objectives (e.g., zero

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tolerance for money laundering) and quantitative targets (e.g., 100% AML training for employees by 2030).

6.2 Non-Engagement in Money Laundering Activities

Saksoft is committed to not participating in, assisting with, or facilitating money laundering or terrorist financing activities. This includes preventing the use of Saksoft's resources, products, or services for such purposes.

6.3 Customer Due Diligence (CDD) and Know Your Customer (KYC)

All customers and third parties must undergo proper identification and verification through Saksoft's CDD and KYC procedures. Enhanced due diligence (EDD) is required for high-risk clients, including PEPs.

6.4 Reporting and Escalation of Suspicious Activity

Employees are required to report any suspicious activities or transactions to the CFO who will assess and, if necessary, report to the appropriate regulatory body.

6.5 Record Keeping

Saksoft will maintain records of customer identities, transactions, and AML compliance activities for a minimum period of 5 years or as required by law. These records ensure that relevant information is available for audits, regulatory inspections, and investigations.

6.6 Training and Awareness

All employees must complete AML training regularly to remain informed of AML requirements, responsibilities, and best practices. Training will cover AML laws, KYC processes, and the identification of suspicious activities.

7. Monitoring and Evaluation

The Compliance Officer is responsible for regularly reviewing and updating Saksoft's AML program, ensuring that it aligns with current laws and regulations. Internal audits will be conducted to evaluate the effectiveness of AML controls and compliance practices.

8. KPIs for Monitoring Policy Implementation

KPIs for Monitoring Policy Implementation

KPI	Description	Target	Frequency	Responsible Team
Employee Training Completion Rate	Percentage of employees completing AML training.	100% completion	Annually	HR
KYC Compliance Rate	Percentage of customers verified through KYC procedures.	100% compliance	Annually	Compliance
	Number of SARs filed.	Actuals	Quarterly	Compliance and Legal

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KPI	Description	Target	Frequency	Responsible Team
Suspicious Activity Reports (SARs)	Percentage resolution of SARs filed.	100%	Quarterly	CFO
Remediation of High-Risk Customers	Percentage of high-risk customers reviewed and remediated.	100% review and remediation	Quarterly	CFO
Audit Findings on AML Compliance	Percentage of corrective actions taken on internal/external AML audit findings.	100%	Annually	Internal Audit

9. Documentation and Record Keeping

All records related to KYC, customer transactions, SARs, and AML training must be maintained and securely stored for 5 years or as per regulatory requirements and Saksoft's record-keeping policy.

10. Distribution List

This policy is distributed to:

- **Board of Directors**
- **CFO and Legal Teams**
- **All Saksoft Employees**
- **Third-Party Service Providers** (where applicable)