

AML Policy

1. Introduction

UTO Capital LTD is a Global Business Company (Company No. C219529), authorised and regulated by the Financial Services Commission (FSC) of Mauritius as an Investment Dealer (Full-Service Dealer, excluding Underwriting) (license No. GB24203195). The registered address is Office 306, 3rd Floor, Ebene Junction Rue de la Democratie, Ebene 72201, Mauritius.

UTO Capital LTD is fully committed to maintaining the highest standards of Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) compliance. In line with Mauritius law and international best practices, the Company supports government efforts to combat money laundering and terrorist financing by implementing robust procedures to identify, verify, and monitor all clients and transactions.

Understanding Money Laundering

Money laundering is the process by which funds derived from illegal activities (such as fraud, corruption, or terrorism) are disguised to appear legitimate. This process typically involves three stages:

- **Placement:** Introducing illicit funds into the financial system via deposits, purchases, or transfers. Techniques such as “smurfing” (multiple small deposits) may be used to evade detection.
- **Layering:** Complex transfers and transactions designed to obscure the origin of the funds.
- **Integration:** The reintroduction of laundered funds into the economy as apparently legitimate assets.

UTO Capital LTD actively prevents its services from being used for such purposes.

Key AML Principles and Commitments

- **Prohibition of Cash Transactions:** To minimize AML risks, UTO Capital LTD does not accept or make cash payments.
- **Right to Suspend:** The Company reserves the right to suspend or terminate any client account or transaction suspected of involvement in money laundering or related illegal activities.
- **Compliance with Laws and Regulations:** All AML procedures comply with Mauritius’ Financial Intelligence and Anti-Money Laundering Act (FIAMLA), FSC regulations, and relevant international standards.

2. Customer Due Diligence (CDD) and Know Your Customer (KYC)

UTO Capital LTD applies a rigorous KYC process to verify the identity and legitimacy of all clients before establishing any business relationship.

Individual Clients

Clients must provide:

- Valid government-issued identification (passport, national ID, or driver's license) with clear photo and signature.
- Proof of residential address (utility bill, bank statement) dated within the last 3 months.
- Notarized English translations for documents in non-Latin scripts.

Corporate Clients

For corporate entities, the following documents are required:

- Certificate of Incorporation and Memorandum & Articles of Association.
- Certificate of Good Standing or equivalent proof of registration.
- Certificate of Shareholders
- Certificate of Directors and Secretary
- Board resolution authorizing account opening and signatories.
- Identification documents of directors, beneficial owners, and authorized signatories.
- Enhanced due diligence for entities from high-risk jurisdictions or with complex ownership structures.

3. Ongoing Monitoring and Transaction Surveillance

UTO Capital LTD continuously monitors client activity to detect unusual or suspicious transactions inconsistent with the client's profile or business. Both automated systems and manual reviews are employed to identify potential AML risks.

Suspicious activities are reported promptly to the Financial Intelligence Unit (FIU) of Mauritius, in accordance with legal obligations.

4. Record Keeping

All client identification data, transaction records, and AML-related documentation (including Suspicious Transaction Reports) are securely maintained for a minimum of seven years after the end of the business relationship, ensuring availability for regulatory review.

5. Deposit and Withdrawal Controls

- All funds deposited must originate from accounts or payment methods registered under the client's name.
- Withdrawals are processed only to accounts or payment methods in the client's name.
- The Company applies a First-In-First-Out (FIFO) principle when processing withdrawals, returning deposited funds first before profits.
- Verification of withdrawal requests includes provision of bank statements or equivalent documents confirming ownership.

6. Sanctions and Enhanced Due Diligence

UTO Capital LTD screens all clients and transactions against international sanctions lists (UN, EU, OFAC, etc.) and applies enhanced due diligence to high-risk clients, including politically exposed persons (PEPs) and clients from jurisdictions with weak AML controls.

7. Employee Training and Compliance Culture

Regular AML/CTF training is provided to all employees to ensure awareness of legal obligations and internal procedures. The Company fosters a culture of compliance and ethical conduct at all levels.

8. Reporting and Cooperation

UTO Capital LTD cooperates fully with regulatory and law enforcement authorities, maintaining confidentiality of reports while ensuring timely disclosure of suspicious activities as mandated by law.

9. Policy Review

This AML Policy is reviewed at least annually or upon significant regulatory changes and approved by the Board of Directors.

UTO Capital LTD is dedicated to preventing the use of its services for money laundering, terrorist financing, or any other illicit activity, ensuring compliance with Mauritius laws and international AML standards.

This document supersedes any previous AML policies and forms an integral part of UTO Capital LTD's compliance framework.