

Compliance & AML Guidance

Hafiz Bros Travel & Money Transfer Limited has policy that is written within the framework of the recommendations of the FATF (Financial Action Task Force) which is an inter-governmental body consisting of 29 countries whose purpose is the development and promotion of policies, both at national and international levels, to combat money laundering and terrorist financing.

Hafiz Bros Travel & Money Transfer Ltd has created enterprise-wide policies covering Anti Money Laundering, Anti Terrorist Financing, Client Due Diligence and Economic Sanctions that set forth minimum standards and guidelines to ensure compliance with UK's new anti-money laundering laws and regulations, and with various other anti-money laundering laws and regulations to which Hafiz Bros Limited operations are subject to in other jurisdictions in which they operate. UK's laws are designed to be consistent with FATF recommendations and other international standards.

Hafiz Bros Travel & Money Transfer Limited is committed to ensuring that appropriate reporting is done on Suspicious Transactions, Terrorist Property, Large Electronic Funds Transfers, and Large cash transactions, to HM Customs and Excise or other related authorities. Furthermore Hafiz Bros Limited's operation keeps regular records, ascertains proper identification, third party determination and has an up to date compliance regime.

Steps to be taken before carrying out any transactions:

New Customers: All original ID documents as per customer notice must be seen. Take photocopies, verify with the date and file away for your records. Please note photocopies are not acceptable.

Existing Customers: Always check if the ID's they have provided in past are up to date and valid. If any of these ID's has expired, ask customer to bring updated ID.

Business Customers: All personal ID's are required by the person who is carrying out the transaction along with Business ID. Also complete business transaction form.

If customer cannot provide the required ID documentation at the time of transaction, inform the customer that transaction will be put on hold until they provide the required documents. If the customer is not willing to provide the required identity documents, you should refuse to make the transactions and inform the Nominated Officer.

Question the customer regarding source of monies and ask to see documentary evidence, also question purpose of the transaction/use of money if necessary. If you have any

suspicious regarding the transaction, please inform the Nominated Officer who will take the appropriate steps.

You should always remember that you reserve the right to refuse to complete the transaction if you find any suspicion at any stage without informing the customer.

Reporting Of Suspicious Transactions:

You have a legal obligation to report suspicions of money laundering, or other attempts to gain from the proceeds of crime to your Nominated Office who is responsible for reporting such suspicions to SOCA.

To report a suspected money laundering or criminal offence in this manner act as a complete defence to any charge of money laundering. It is therefore essential that all suspicions, no matter how remote, should be reported without delay. This action will protect you from any claim for breach of customer confidentiality.

As the types of transactions which may be used by money launderers are almost unlimited, it is difficult to define a suspicious transaction. However, it is important to properly differentiate between the terms "unusual" and "suspicious".

Where a transaction is inconsistent in amount, origin, destination, or type with a customer's known, legitimate business or personal activities, the transaction must be considered unusual, and the client put "on enquiry."

1. Examine the background and purpose of the transactions or circumstances;
2. If no evidence of identity was produced after the business relationship was established, take steps to obtain satisfactory evidence of identity;
3. If evidence of identity has already been produced, take steps to determine whether it is satisfactory and if it is not satisfactory, take steps to obtain satisfactory evidence of identity.

The trigger events outlined in the code are:

1. Transactions that are suspected may be related to money laundering or terrorist financing;
2. Patterns of behaviour occurring that cause a Licence holder to know or suspect that the behaviour is or may be related to money laundering or terrorist financing;
3. Transactions or patterns of transactions that are complex or unusually large and which have no apparent economic or visible lawful purpose;

4. Unusual patterns of transactions that have no apparent economic or visible lawful purpose;
5. The Licence holder becomes aware of anything which causes them to doubt the identity of the person who, in relation to the formation of the business relationship, was the applicant for business;
6. The Licence holder becomes aware of anything which causes them to doubt the veracity or adequacy of evidence of identity already produced.

Questions to ask your self:

The following factors should be borne in mind when seeking to identify a suspicious transaction:-

- a. Is the customer known personally?
- b. Is the transaction in keeping with the customer's normal activity known to the licence holder, the markets in which the customer is active and the customer's own business? (i.e. does it make sense?)
- c. Is the transaction in keeping with normal practice in the market to which it relates i.e. with reference to market, size and frequency?
- d. Is the role of the agent involved in the transaction unusual?
- e. Is the transaction to be settled in the normal manner?
- f. Are there any other transactions linked to the transaction in question which could be designed to disguise money and divert it into other forms or to other destinations or beneficiaries?; and
- g. Can you understand the reason for the transaction i.e. is there an easier, cheaper or more convenient method available?

Here are some key facts to determine if the transaction is suspicious:

New Customers:

1. Is the customer refusing or hesitant to provide required information or identification?
2. Is the customer providing unusual or suspicious documents, for example an altered passport or driving licence where date of birth does not match the age of the customer?
3. Is the customer concerned weather there is any record keeping requirements?
4. Is the customer behaving suspiciously? Does the customer seem uncomfortable or anxious?

Established or Regular Customers:

1. Is the transaction reasonable in the context of the normal business of a regular customer?
2. Is the size and frequency of the transaction consistent with the normal activities of the customer?
3. Has the pattern of transaction changed since the business relationship was established?

Consider these factors before reporting to your Nominated officer. If in doubt, you should report it. You have nothing to lose and everything to gain.

Your Nominated Officer is Mr xxxxxxxxxxxxxxxxxxxxxxxxx.