

## Summary of Anti-Money Laundering and Terrorist Financing Program

The Jordan Microfinance Company "Tamweelcom" is licensed by the Central Bank of Jordan, and it is committed to implementing the AML/CTF Law No. (20/ 2021) and instructions related to combating money laundering and terrorist financing for microfinance companies No (8/2020). All necessary procedures are taken in order to comply with these laws and instructions, and to ensure that all products and services are not used in suspicious activities.

Commitment to the principles of combating money laundering and terrorist financing is one of the company's priorities to build relationship with clients based on ethical bases and apply best practices and standards to combat money laundering and terrorist financing, Especially with Implementation of (Know Your Customer) and taking the necessary Procedures to definition the ultimate beneficial owner of all operations.

**• AML/CTF program is based on the laws and instructions issued by the supervisory authorities in Jordan and international bodies. The program includes the following:**

1. Completing the Anti-Money laundering and Terrorist Financing Policy that approved by the Board of Directors, and circulated to all company employees with different job duties and levels of management.
2. Establishing the Compliance and AML/CTF Department, which is an independent department reporting directly to the Board of Directors through the Compliance and Anti-Money Laundering and Terrorist Financing Committee emanating from the Board. The departments' responsibilities is to review the policy of combating money laundering and terrorism financing continuously, to Provide recommendations to the committee and the BOD, and to advise the executive departments to comply with the requirements of this program.
3. Enhancing the Compliance and AML/CTF Department with qualified and trained Human Resources. In addition, to Automatizing the AML/ CTF systems to achieve the Departments' goals, and enhance the departments' efficiency.
4. Appointing a "MLRO" (Money Laundering Reporting Officer), his deputy, to report independently, and confidentially any suspicious transaction of money laundering to the Anti-Money Laundering and Terrorist Financing Unit, and preparing statistical reports to the board member.
5. Implementing the "CDD" (Customer Due Diligence Program), which includes procedures for identifying and verifying the identity of the customer through "KYC" (Know Your Customer) application, ascertaining the beneficiary owner and risk assessment for the customers.
6. Insuring the Commitment to the policy of identifying the beneficial owner and taking reasonable measures to verify it.

7. Risk assessing for money laundering annually or based on the “RBA” (Risk Based Approach) if needed, by classifying clients according to factors, including (residence, type of client, ownership structure, PEP, nationality, products and services).
8. Taking appropriate action “EDD” (Enhanced Due Diligence) when Clients Assessed as High Risk, Such as “PEP” (Person Exposed Politically) and their first-degree relatives. Banning dealing with any names on the international sanction lists, the most important UN sanction list and prohibition of opening anonymous or digital accounts or dealing with fictitious companies or banks.
9. Reliancing on Procedures and action plan to monitor customer activity for purpose of identifying and reporting suspicious activity.
10. Participating in project teams and assessing risks for new products before launching in terms of their exploitation of money laundering and terrorist financing activities and set mitigating controls.
11. Allocating the reporting channels for employees to report on any suspicion transactions linked to money laundering or terrorist financing by filling out the suspicion form and sending it to the “MLRO” (Money Laundering Reporting Officer).
12. Including the Code of Professional Conduct deterrent measures in case of default or non-compliance with the requirements contained within the program to combat money laundering and terrorist financing.
13. Training the company’s’ employees on combating money laundering and terrorist financing and Suspicion patterns of money laundering and terrorist financing.
14. Achieving the documents and records in a safe manner and backup copies of them in another place, according to stipulated period.
15. Auditing the Department tasks by the internal and external audit and Submitting the findings and recommendations to the audit committee emanating from the board of directors.