

AML & CTF POLICY

Updated: 15 August 2022

Overview

This policy document aims to protect and prevent Linea Capital Partners (Pty) Ltd (“Linea”) and its affiliates from being misused by money laundering or terrorist and criminal bodies or being misused by any individual or entity in any illegitimate action. Our objective is to protect Linea from legal, reputation, operational and concentration risks associated with these actions.

This policy is applied to all activities, services, products, work places within Linea’s geographical scope.

Main Objectives

- Combating and preventing money laundering and terrorist financing and taking all the necessary preventive measures to limit exposure for Linea and its affiliates;
- Preventing the misuse of Linea by any individual or entity in illegitimate operations;
- Determining the legal and administrative responsibilities of Linea and of its employees related to anti-money laundering;
- Reporting any suspicious operations which include the probable activities of the operations of money laundering and terrorist financing to the relevant authorities;
- Training Linea staff on the rules and internal procedures which have to be observed, the risks that could be faced and how they can limit the risks and potential losses associated with money laundering and terrorist financing operations in their various roles and positions.

General Principles and Integration into KYC Policies

Linea believes that the existence of a clear policy in terms of accepting a new customer through applying a KYC policy and applying the procedures and principles of "Customer Due Diligence" (CDD) in a way that suits the legal and control requirements and serves Linea and its customers' interests is considered one of the best preventive methods in anti-money laundering and terrorist financing. Refer to Linea’s KYC policy for additional detail.

Policy Statement

Linea is committed to:

- Accept only those customers whose identity can be established and verified and whose source of funds can be reasonably established to be legitimate.
- Not establish a business relationship for anonymous persons or those with fictitious names including anonymous accounts. Moreover, Linea will not enter into transactions with entities or individuals in the following categories:
 - The persons whose real identities cannot be determined or whose addresses or workplaces cannot be known;
 - Persons and institutions whose names are blacklisted (terrorism and money laundering lists) issued by the relevant authorities;
 - Bodies and persons working in the field of gambling or practicing in “sin industries”.
- Make every possible effort to know the identity of the customer and the real beneficiary: the full name, ID number, place and date of birth and verifying the identity by using valid, official and accredited documents "identification data" issued by official bodies, in addition to the data and information available from trusted independent sources.
- Ensure that where administration services are procured, in South Africa or in other jurisdictions, that the chosen administrator complies with Linea’s AML, KYC and FTC requirements.
- Apply a risk-based approach, and enhanced customer due diligence where required.
- Monitor and identify suspicious transactions and activities and ensure that suspicious activity is reported.
- Provide periodic and appropriate AML / CTF training and information to all employees to increase their awareness using various methods, such as training sessions and electronic devices on an ongoing basis.
- Maintain records which are appropriate to the nature and complexity of the entity’s business, and all identity or business relationship records must be kept for a minimum period of 5 years from the end of Linea’s relationship with the entity.
- Have an established review function to examine the adequacy of AML policies and procedures.
- Have an anonymous whistleblowing channel and policies to protect employees if they report, in good faith, any suspicious activities.