



POLICY – MONEY LAUNDERING & FINANCE OF TERRORISM

VERSION NUMBER	REVIEWED DATE	NEXT REVIEW	REVIEWED BY
1	August 2021	August 2022	Management

PURPOSE

The purpose of the policy is to do all we can to prevent the organisation and its staff from being exposed to money laundering, to identify the potential areas where it may occur, and to comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases.

Money laundering is the attempt to conceal or disguise the nature, location, source, ownership or control of illegally obtained money. Money laundering is illegal.

SCOPE OF THE POLICY

This policy applies to all employees and aims to maintain the high standards of conduct, by preventing criminal activity through money laundering

OBLIGATIONS AND RESPONSIBILITIES

- Employees must identify suspicious and unusual transactions;
- Report these transaction to Management to investigate;
- Identification and verification of clients before transacting;
- Keep record of the identification and verification document;
- Check the new clients / organisation's website to confirm its business address and anyother details;
- Attending the client at their business address;
- Evidence of the personal identity of the key contact person and the organisation;
- If satisfactory evidence of identity is not obtained at the outset of the matter then thebusiness relationship or once off transaction cannot proceed any further;
- No Payments to third party accounts and cash payments must be signed for by theresponsible person who was identified as the companies contact person.

IDENTIFICATION AND VERFICATION REQUIREMENTS

All staff who are required to identify and verify clients shall do so in the following manner:

- Ensure that the client does not conduct business under false names.



- Identify whether the client is a
 - Natural Person
 - Natural person acting on behalf of another
 - Foreign National
 - Close Corporation
 - South African Company
 - Foreign Company
 - Other legal Person
 - Partnership
 - Trust

RECORD KEEPING PROCEDURE

- Client identification document or company documents
- Printed record of due diligence checks to verify the individual/company details and related compliance requirements
- Details of all relevant business transactions carried out for clients for at least five years. This is so that they may be used as evidence in any subsequent investigation Moon Investments must be capable of providing an audit trail, for example distinguishing the client and the relevant transaction and recording in what form any funds were received or paid.

INDIVIDUAL RESPONSIBILITIES

- To be alert to where Moon Investments may be targeted by individuals trying to launder the proceeds of crime
- To report any suspicions of money laundering to Management
- It is not your responsibility to decide whether a suspicious transaction actually constitutes money laundering.
- Failure by any employee or staff member to adhere to any of the requirements and obligations contained herein shall result in disciplinary action being taken against the relevant staff member.

It is the employee's responsibility to contact management should he/she have any queries.

Employees are invited to comment on this policy and to suggest ways in which it might be improved.

Comments, suggestions and queries should be addressed to line Management.