

# **Anti-Money Laundering and Counter-Terrorist Financing Policy (the “AML Policy”)**

**BIGIDEA NETWORK FZ-LLC**

---

## **1. Introduction**

BIGIDEA NETWORK FZ-LLC (the “Company”), a company incorporated in the United Arab Emirates, is committed to maintaining the highest standards of compliance with applicable Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) laws and regulations.

This AML Policy forms an integral part of the Company’s compliance framework and is implemented in accordance with the applicable legislation of the United Arab Emirates, including:

- UAE Federal Decree-Law No. 10 of 2025 on AML/CFT;
- Cabinet Decision No. 134 of 2025;
- Cabinet Decision No. 74 of 2020;
- applicable guidance issued by UAE supervisory authorities;
- international standards issued by the Financial Action Task Force (FATF).

The Company also considers relevant international sanctions regimes, including those issued by the United Nations, European Union, and the U.S. Office of Foreign Assets Control (OFAC).

The purpose of this AML Policy is to prevent, detect, and mitigate risks related to money laundering, terrorist financing, and sanctions violations, while ensuring full compliance with applicable legal and regulatory requirements.

---

## **2. Objectives of the AML Policy**

The main objectives of this AML Policy are:

- a) to ensure compliance with applicable UAE AML/CFT laws, regulations, and international standards;
  - b) to prevent the use of the Company’s services for money laundering, terrorist financing, fraud, or other illegal activities;
  - c) to establish effective internal controls and risk management procedures;
  - d) to protect the Company’s reputation and safeguard its Clients and partners;
  - e) to ensure proper identification, monitoring, and reporting of suspicious activities.
-

### **3. AML/CFT Programs and Internal Control Framework**

The Company implements AML/CFT measures through a system of internal control programs based on a risk-based approach and aligned with UAE regulatory requirements and international best practices.

---

#### **3.1. Risk Management Program**

The Company applies a risk-based approach to identify, assess, and mitigate AML/CFT risks.

This includes:

- classification of Clients by risk level (Low, Medium, High);
  - consideration of geographic risk, business activity, ownership structure, and transaction patterns;
  - identification of high-risk categories, including Politically Exposed Persons (PEPs) and high-risk jurisdictions;
  - application of Enhanced Due Diligence (EDD) measures where required.
- 

#### **3.2. Identification and Verification Program**

The Company implements procedures for identification and verification of Clients, their representatives, and Ultimate Beneficial Owners (UBOs).

This program includes:

- collection and verification of identification data and supporting documentation;
- verification of ownership and control structure;
- screening against sanctions lists, PEP databases, and adverse media;
- verification of source of funds and, where applicable, source of wealth.

The identification program is conducted prior to establishing a business relationship and updated periodically.

---

#### **3.3. Sanctions Screening Program**

The Company maintains procedures to ensure compliance with applicable sanctions regimes.

This includes:

- screening Clients and counterparties against applicable sanctions lists (including UN, UAE local lists, OFAC, and others);
- ongoing screening of transactions and business relationships;

- prohibition of business relationships with sanctioned individuals, entities, or restricted jurisdictions;
  - implementation of appropriate controls to prevent sanctions breaches.
- 

### **3.4. Transaction Monitoring Program**

The Company conducts continuous monitoring of Client activity to detect suspicious transactions.

Monitoring includes:

- analysis of transactions in real time and post-transaction;
  - identification of unusual, complex, or inconsistent transaction patterns;
  - use of automated and manual controls proportionate to the risk level;
  - application of restrictions, delays, or rejection of transactions where necessary.
- 

### **3.5. Suspicious Activity Identification and Reporting Program**

The Company has procedures to identify and report suspicious activities.

This includes:

- internal escalation and review of suspicious transactions or behaviors;
  - documentation and analysis of identified risks;
  - submission of Suspicious Activity Reports (SAR) or Suspicious Transaction Reports (STR) to the UAE Financial Intelligence Unit (FIU) via the goAML system;
  - cooperation with competent authorities as required by law.
- 

### **3.6. Record Keeping Program**

The Company maintains comprehensive records related to AML/CFT compliance, including:

- Client identification data;
- transaction records;
- risk assessments and due diligence documentation;
- internal investigations and reports.

All records are retained for at least five (5) years following the end of the business relationship or longer if required by applicable law.

---

### **3.7. Training Program**

The Company ensures that employees receive regular AML/CFT training.

This includes:

- onboarding training for new employees;
  - periodic refresher training;
  - role-based training for employees involved in AML/CFT functions;
  - maintenance of training records and materials.
- 

### **3.8. Internal Control and Governance Program**

The Company maintains an effective internal control framework, including:

- appointment of a Compliance Officer responsible for AML/CFT;
- implementation of internal policies and procedures;
- independent review and periodic audit of AML/CFT controls;
- segregation of duties and prevention of conflicts of interest.

The Compliance Officer is responsible for overseeing implementation, monitoring effectiveness, and reporting to management.

---

### **4. Duties and Responsibilities of Employees**

All employees of the Company are required to:

- a) comply with this AML Policy and internal procedures;
- b) exercise due diligence and remain alert to potential suspicious activity;
- c) promptly report any concerns to the Compliance Officer;
- d) participate in mandatory AML/CFT training programs;
- e) maintain confidentiality and avoid “tipping-off” Clients.

Failure to comply with AML/CFT obligations may result in disciplinary action, including termination of employment.

---

### **5. Conclusion**

BIGIDEA NETWORK FZ-LLC is committed to maintaining a robust AML/CFT compliance framework and upholding the highest standards of integrity, transparency, and regulatory compliance.

All information obtained in the course of AML/CFT procedures is treated as confidential and used solely for compliance and risk management purposes. Such information may only be disclosed where required by law or regulatory authorities.

The Company reserves the right to amend this AML Policy to reflect changes in legal, regulatory, or operational requirements.

For further information, please contact: **[compliance@bigidea-network.com](mailto:compliance@bigidea-network.com)**