



GLOBAL MEDIARY ACQUISITIONS LTD

92A Warren Road
London, U. K.
E10 5QA

T +44 7477 009 333
Main +44 2036 05 3677
uk@gmacquisitions.com

www.gmacquisitions.com

Anti-Money-Laundering 2018

Global Mediary Acquisitions Ltd.

Companies-House registration number 11119047, 20-22 Wenlock Road, London, N1 7GU, Tel. 0203 605 3677, uk@gmacquisitions.com

ANTI-MONEY LAUNDERING POLICY AND PROCEDURES of Global Mediary Acquisitions Ltd.

Last review date: 1st March 2018

Prepared by: The Director (Kyle Philippe Yesung)

POLICY STATEMENT

These are the Anti-Money Laundering (ALM) Policy and Procedures adopted by Global Mediary Acquisitions in compliance with the Money Laundering Regulations 2007 (MLR). The business will actively prevent and take measures to guard against being used as a medium for money laundering activities and terrorism financing activities and any other activity that facilitates money laundering or the funding of terrorist or criminal activities.

To these ends:

- The identities of all new and existing clients will be verified to a reasonable level of certainty
- Any suspicious activity will be reported, and all AML activities recorded
- All staff that meet or contact clients and potential clients of this firm are required to acknowledge that the policy and procedures have been read and understood before meeting or contacting clients.



CUSTOMER DUE DILIGENCE

- The business has established a Know-Your-Client (KYC) policy to ensure that the identities of all new and existing clients are verified to a reasonable level of certainty. This will include all individual clients, all directors and shareholders with a stake holding of 25% or more of client companies, all partners of client partnerships, and every board member of client charities. Identities will be verified either online or face-to face or by a combination of both.
- Only recognised online identity verification agencies, which use data from multiple sources over a period of time, will be used (such as CallCredit), also including local agencies for overseas clients. These commercial agencies must have processes that allow the enquirer to capture and store the information they use to check and verify an identity.
- The following documentation may be presented by the individual:
 - In person: Either a passport, driver's license, or government issued document featuring a matching photograph of the individual, and a full name and date of birth matching those provided.
 - An original recent utility bill, or government issued document with the same and address matching those provided by the individual.
 - Not in person
 - As in person but additionally: Any government issued document that provides the date of birth, NI or Tax number or other such government identifier.
 - Other forms of identity confirmation, such as evidence of a long standing relationship with the client, or a letter of assurance from independent and reliable persons or organisations, who have dealt with the client for some time, may also provide a reasonable level of certainty.



-
- If the business fails to verify the identity of a client with reasonable certainty it will not establish a business relationship or proceed with the transaction. If a potential or existing client either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, the business shall refuse to commence a business relationship or proceed with the transaction requested.

RISK ASSESSMENT AND ONGOING MONITORING

- The business shall take a risk-based approach in monitoring the financial activities of its clients. This will be carried out whilst preparing the accounts or tax returns, or conducting any other business with the client.
- The business will actively not accept high-risk clients that are identified as follows: Clients with larger one-off transactions, or a number of transactions carried out by the same customer within a short space of time.
- Situations where the source of funds cannot be easily verified.
- Unusual patterns of transactions that have no apparent economic or visible lawful purpose.
- Money sent to or received from areas known to have high levels of criminality or terrorist activity.
- The business will conduct ongoing monitoring of business relationships with customers, to ensure that the documents, date or information held evidencing the customer's identity are kept up to date.
- The following are examples of changes in a client's situation that may be considered suspicious: A sudden increase in business from an existing customer; Uncharacteristic transactions which are not in keeping with the customer's known activities; Peaks of



activity at particular locations or at particular times; Unfamiliar or untypical types of customer or transaction.

- Whenever there is cause for suspicion, the client will be asked to identify and verify the source or destination of the transactions, whether they be individuals or company beneficial owners.
- No action need be taken if there is no cause for suspicion.

SUSPICIOUS ACTIVITY REPORTING

- A Suspicious Activity Report (SAR) will be made to the National Crime Agency (NCA) as soon as the knowledge or suspicion that criminal proceeds exist arises.
- The MLRO will be responsible for deciding whether or not the suspicion of illegal activity is great enough to justify the submission of a SAR.
- Further details on NCA and SARS can be found at <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/ukfiu/how-to-report-sars>.



RECORD-KEEPING

- Records of all identity checks will be maintained for up to 5 years after the termination of the business relationship or 5 years from the date when the transaction was completed. The business will ensure that all documents, data or information held in evidence of customer identity are kept up to date.
- Copies of any SAR, together with any supporting documentation filed will be maintained for 5 years from the date of tiling the SAR.
- All records will be handled in confidence, stored securely, and will be capable of being retrieved without undue delay.