

DUHANI

KYC/AML  
Policy

Duhani Capital is dedicated to upholding the highest standards of compliance with antimoney laundering (AML) and counter-terrorist financing (CTF) regulations. The objective of the Company's Policy against Money Laundering and Terrorism Financing is to actively prevent the risks associated with these matters. To assist government efforts in combating the financing of terrorism and money laundering activities, the law mandates that all financial institutions obtain, verify, and record information identifying each person who opens an account. We are obligated to report any suspicious client activity relevant to money laundering.

## **Money Laundering**

Money laundering involves the process of converting funds acquired from illegal activities (such as fraud, corruption, or terrorism) into other forms or investments that appear legitimate, thereby concealing or distorting the actual source of the funds. The money laundering process can be divided into three sequential stages:

- i. Placement**  
During this stage, funds are converted into financial instruments such as checks, bank accounts, or money transfers. Alternatively, they may be used to purchase high-value goods that can be resold. Funds may also be physically deposited in banks or nonbank institutions (e.g., exchange houses). To avoid suspicion, perpetrators may make multiple deposits instead of a single lump sum; this form of placement is referred to as "smurfing."
- ii. Layering**  
Funds are transferred or moved to other accounts and financial instruments to disguise their origin and obscure the trail of transactions. By moving funds and altering their form, money launderers make it difficult to trace the illicit funds.
- iii. Integration**  
Laundered funds are reintroduced into the financial system as legitimate assets to purchase goods and services.

Duhani Capital adheres strictly to the principles of Anti-Money Laundering and actively prevents any actions that facilitate or enable the laundering of illegally obtained funds. Our AML policy aims to prevent the utilization of our services by criminals for the purposes of money laundering, terrorist financing, or any other criminal activity.

To prevent money laundering, Duhani Capital does not accept or disburse cash under any circumstances. The company reserves the right to suspend the operations of any client suspected of engaging in illegal activities or deemed to be involved in money laundering, according to the discretion of our staff.

## **Company Procedures:**

Duhani Capital ensures that each customer is a legitimate entity, whether an individual or a legal entity. The company follows all necessary measures in compliance with applicable laws and regulations issued by monetary authorities.

Our AML policy is enforced through the following means:

- I. Know Your Customer (KYC) Policy and Due Diligence
- II. Monitoring of Customer Activity
- III. Maintenance of Records

## **Know Your Customer:**

In line with our commitment to AML and KYC policies, every customer must undergo a verification procedure before initiating any cooperation with Duhani Capital. The company verifies the identity of each client or counterparty through satisfactory evidence or other measures producing proof of identity. Enhanced scrutiny is applied to clients residing in countries identified by credible sources as having inadequate AML standards or posing a high risk of crime and corruption, as well as beneficial owners residing in and sourcing funds from such countries.

## **For Individual Clients:**

During the registration process, each client must provide personal information including full name, date of birth, country of origin, and full residential address. The following documents are required for verifying personal information:

- I. Valid passport (showing the first page with photo and signature)
- II. Driving license with photograph
- III. National identity card (both front and back)
- IV. Documents proving current permanent address (e.g., utility bills, bank statements) not older than 3 months from the filing date. If documents are in non-Latin characters, a notarized English translation is required to avoid delays in verification.

## **For Corporate Clients:**

If the applicant company is listed on a recognized or approved stock exchange, or there is independent evidence demonstrating it as a wholly owned subsidiary or under the control of a listed company, no further verification steps are typically necessary. If the company is not listed and none of the main directors or shareholders have an existing account with Duhani Capital, the following documentation must be provided:

- I. Certificate of incorporation or national equivalent
- II. Memorandum and Articles of Association
- III. Certificate of good standing or proof of registered address
- IV. Board resolution authorizing the account opening and granting authority to designated operators
- V. Copies of powers of attorney granted by directors
- VI. Identity proof of directors (following individual verification rules)
- VII. Proof of identity of beneficial owner(s) or authorized signatories (following individual verification rules).

## **Tracking Customer Activity:**

In addition to collecting customer information, Duhani Capital continuously monitors customer activity to identify and prevent any suspicious transactions. A transaction is considered suspicious if it deviates from the customer's legitimate business or transaction history. We employ a transaction monitoring system, both automatic and manual as necessary, to prevent criminals from utilizing our services.

**Maintenance of Records:**

All transaction data and information obtained for identification purposes, along with documents related to money laundering concerns (e.g., suspicious activity reports, AML account monitoring documentation), must be recorded and retained for a minimum of 7 years after account closure.

**Measures Taken:**

In cases of suspected money laundering or other criminal activity, Duhani Capital will act in accordance with applicable laws and report the suspicious activity to the relevant regulatory authority. We reserve the right to suspend the operations of any client suspected of engaging in illegal activities or associated with money laundering, at the discretion of our staff. Duhani Capital may temporarily block suspicious accounts or terminate relationships with existing customers.

For further inquiries, please contact us at [support@duhanicapital.com](mailto:support@duhanicapital.com)