

Anti-Money Laundering, Counter Terrorist Financing, and Sanctions Policy

Authorisation:

Document Creator	Document Owner	Reviewed By	Approved By
Legal Officer	Legal Officer	COO/CEO	Chairman

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Effectivity

"Effectivity date shall be as per the date this document is signed and approved"

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I. GLOSSARY OF TERMS

The definition of abbreviation and terms used in this are provided in the following table.

Terms	Definition
Money Laundering	<p>a. the conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such an activity to evade the legal consequences of that person's action;</p> <p>b. the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from an act of participation in such an activity.</p>

Terms	Definition
	<p>c. the acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such an activity.</p> <p>d. participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions referred to in points (a), (b) and (c).</p>
Terrorism Financing	The provision or collection of funds, by any means, directly or indirectly, with the intention that they be used or in the knowledge that they are to be used, in full or in part, in order to carry out any terrorist act.
Sanctions	Sanctions are the regulatory restrictions applicable to dealings with certain countries/territories, governments, groups, entities, individuals, or controlled goods or services. The nature and extent of these restrictions may vary (i.e. limitations on import/export, controls on specific goods and services, restrictions on financial operations, etc.). And it is important that all HARLOW employees and Contractors consult with the Legal Manager to understand the business implications.
AML	Anti-Money Laundering.
CFT	Combating the Financing of Terrorism
Customer Due Diligence (CDD)	Is the process where relevant information about the customer is collected and evaluated for any potential risk for the organization or money laundering/terrorist financing activities
Politically exposed persons (PEP)	Individuals who are or have been entrusted with prominent public functions in the Territory, or by a foreign State or by a recognized organization.
Code of Ethics	Principles relevant to the profession and practice of internal auditing and rules of conduct that describes behaviour expected of internal auditors.
Compliance	Conformity and adherence to plans, policies, procedures, laws, regulations, contracts, or other requirements.
Sanctions List	<p>a list established by a decision of the Attorney General Prosecutor and maintained by the NCTC, it shall include:</p> <ul style="list-style-type: none"> • The Natural persons and entities designated on the UN Security Council List. • The Natural persons and entities designated by a decision of the Attorney General, at the proposal of the NCTC.
Security Counsel List	A list issued and maintained by the competent UN agency, which includes all individuals and entities subject to specific financial penalties in accordance with Security Council resolutions, and may also include individuals, entities and other groups subject to specific financial penalties due to their funding of the proliferation of weapons of mass destruction pursuant to Security Council resolutions and all private identifying information.
Territory	Any of the Countries where any of the Harlow Group companies, Affiliates and Subsidiaries are officially operating its business. Mainly “and as of now” UAE, Iraq, UK and Korea.

Terms	Definition
Control	Any action taken by the management to manage risk and increase the likelihood that established objectives and goals will be achieved. Management is responsible for planning, organizing, and directing the performance of sufficient actions to provide reasonable assurance that objectives and goals will be achieved in a timely manner.
Control Processes	The policies, procedures, and activities that are part of a control framework, designed to ensure that risks are contained within the risk tolerances established by the risk management process.
Engagement	A specific AML/CFT assignment, task, or review activity.
Risk	The possibility of an event occurring that will have an impact on the achievement of objectives.

II. AML, CFT, AND SANCTIONS POLICY STATEMENT

HARLOW, is an Enterprises Company established in 2002. Who is mainly specialized in the Energy Projects and its related services.

This anti-money laundering, combating the financing of terrorism, and sanctions (“AML/CFT”/S) policy and procedures are in compliance with the legal and regulatory requirements of the Territory. These legal and regulatory requirements reflect the FATF recommendations on Money Laundering and Terrorist Financing. The HARLOW AML/CFT/S Policy procedures and guidelines apply to the operations of all affiliates and subsidiaries (collectively “HARLOW”). For the purposes of this policy legitimacy means the non-inclusion in the Sanction List or the Security Council List and/or non-involvement in:

- a) Money Laundering activity or,
- b) Terrorism Financing activity or,
- c) Proliferation of weapons of mass distribution activity.

HARLOW has established its internal systems and procedures to ensure that business relationships are commenced with clients whose identity and activities can reasonably be established to be legitimate including the identification of the beneficial owners.

HARLOW collects, records, and retains all relevant client information in accordance with the regulatory requirements. HARLOW also has systems in place to monitor, identify, and report suspicious transactions.

AML/CFT training is regularly provided to employees. In addition, both internal and external auditors review the effectiveness of the AML/CFT procedures and controls on an annual basis. It is worth mentioning that HARLOW prohibits dealings with shell banks, casinos, any identified illegal activity whatsoever based on local laws.

HARLOW is committed to comply with sanctions programs and lists issued by the United Nations Security Council, Office of Foreign Asset Control (OFAC) of the United States, United Kingdom, European Union, and sanction programs and lists issued by the Attorney General and/or Programmes and Lists placed by any Regional or international authority where any

HARLOW entity operates. In this context, HARLOW is committed to prevent, detect and where applicable report any dealings with sanctioned persons/entities who are under running embargos.

HARLOW has also established policies and procedure designed for customers & transactions screening against international and locally listed names and designated entities.

A proactive structure of officers is in place to ensure group-wide compliance with AML/CFT and Sanction procedures, and the timely update of the same to reflect the changes in regulatory requirements. This structure consists every Section Head and Legal Manager who re[ports accordingly to the COO with a dotted line to the MD.



CHAPTER ONE

Anti-Money Laundering, Counter Terrorist Financing

1. INTRODUCTION

HARLOW is responsible for establishing an internal monitoring instruments, work frame and procedures that are appropriately structured and that operates to comply with the requirements of the laws and regulations in the Territory. This policy is issued to conform, where applicable, to the following Territorial Legal Instruments: ①

- Combating Money Laundering and Terrorism Financing
- Anti-Terrorism Laws.
- Terrorism Combating Laws.
- AML & CFT Rules for the Stock Market Authorities

This Policy is intended to correspond on mutatis monades basis with above mentioned laws, regulations, rules, resolution, and any international conventions ratified by the government of Territory. Furthermore, in case of any change in the reference foregoing legal instruments, this policy shall be changed/edited accordingly immediately in line with any law/regulations amendments.

PURPOSE

The purpose of this policy is to establish the general framework in HARLOW and its affiliates/subsidiaries to guard against money laundering, terrorism financing, terrorism combating and to prevent conducting business with parties who are under present sanctions. The policy underlines the appropriate means that facilitates application of the International, regional and local sanctions regime imposed against entities and individuals by reason of their involvements of money laundering, terrorism and weapons of mass destruction proliferation. HARLOW also puts reasonable measures in place to control and to limit ML/FT risk, including dedicating the appropriate means.

① - UAE Government has implemented a robust Anti-Money Laundering (AML) system by enacting – Law No. 4/2002, the Anti-Money Laundering law & Law No. 1/2004, the counterterrorism law are the two laws. The principle AML/CFT legislation applicable is the Federal Decree-Law No. (20) of 2018 On Anti-Money Laundering and Combating the Financing of Terrorism and Financing of Illegal Organisations (the “AML-CFT Law” or “the Law”) and implementing regulation, Cabinet Decision No. (10) of 2019 Concerning the Implementing Regulation of Decree Law No. (20) of 2018 On Anti-Money Laundering and Combating the Financing of Terrorism and Illegal Organisations (the “AML-CFT Decision” or “the Cabinet Decision”)

-In the UK: The UK anti-money laundering regime requirements are set out in the Proceeds of Crime Act 2002 (POCA) (as amended by the Serious Organised Crime and Police Act 2005 (SOCPA)), the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017) and the Terrorism Act 2000 (TA 2000) (as amended by the Anti-Terrorism, Crime and Security Act 2001 (ATCSA 2001) and the Terrorism Act 2006 (TA 2006))- The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 (MLR 2019), which came into force on 10 January 2020, implement the EU Fifth Money Laundering Directive in the UK.

-AML/CFT Framework in Korea: The history of the AML/CFT system in Korea started with the establishment of the Korea Financial Intelligence Unit (KoFIU) and the enactment of the Financial Transaction Reports Act and the Proceeds of Crime Act in November 2001. The KoFIU was established pursuant to Article 3 Paragraph 1 of the Financial Transaction Reports Act (FTRA) and to Article 5 of the Enforcement Decree of the FTRA in order to effectively implement an AML/CFT system. The Proceeds of Crime Act (POCA), also enacted in November 2001, criminalizes money laundering and provides for the confiscation of criminal proceeds. Under Article 3 of POCA, any person who disguises the acquisition or disposition of criminal proceeds, disguises the origin of criminal proceeds, or conceals criminal proceeds is

subject to imprisonment not exceeding five years or a fine not exceeding KRW 30 million. Article 8 of the POCA provides for the confiscation of criminal proceeds and Article 10 of the same Act provides for the confiscation of property of equivalent value to criminal proceeds.

-Iraq has defined Money Laundering in its Anti-Money Laundering and Counter-Terrorism Financing Law [No. 39 of 2015] ("AML Law"). The Central Bank of Iraq has within its organizational framework the Anti-Money Laundering Office that is directly connected to the Governorship of the Bank.

HARLOW is committed to high standards of sanctions imposition, anti-money laundering / counter the financing of terrorism (AML/CFT) compliance and requires management, employees and subsidiaries to adhere to these standards in preventing the use of its products, services and funds for any such activities.

This Policy has been developed by HARLOW to help its employees and contractors understand where issues related to sanctions regulations may arise and to support them in making the right decisions.

SCOPE OF APPLICATION

This Policy applies to the entire HARLOW's operations, including all legal entities owned or controlled by HARLOW, and to all directors, officers, contractors, and other third parties acting on behalf of the foregoing.

2. HARLOW POLICY STATEMENT

- It is HARLOW's policy to comply with all Sanctions Laws in our operations. To this end, HARLOW will comply with all economic and trade sanctions and Money Laundering and Terrorism Combating Laws and Regulations applicable to our business activities in the Territory.

HARLOW Management and its employees will not be responsible for any loss of business resulting from adherence to this Policy. No employee or contractor will suffer as a consequence of bringing to the attention of the senior management, in good faith, a known or suspected breach of this Policy. Also, employees and contractors will not suffer any adverse employment decision for abiding by this Policy.

Violations of Sanctions Laws may lead to severe civil and/or criminal penalties against companies and individuals, including significant monetary fines, imprisonment, extradition, blacklisting, revocation of licences, and disqualification of directors.

Any employee who violates the rules in this Policy or who permits anyone to violate those rules shall be subject to appropriate disciplinary action, up to and including dismissal, and may be subject to criminal fines.

- HARLOW is committed to put in place appropriate systems and controls to avoid money laundering and terrorist financing in connection with its business. HARLOW Also requires concerned staff to report all knowledge or suspicions of money laundering, terrorist financing and any dealing or prospective dealing with any sanctioned entry or individual.
- The well-developed procedures and formalities will sufficiently establish a Customer due diligence, the client's identity (and any beneficial owners) as well as searching the sanction list and list of politically exposed persons their family members and their close associates, if any, prior the involvement of any kind of contractual, service process.

3. RED FLAGS

- Any suspicion of the direct or indirect involvement of a sanctioned territory, sanctioned party, controlled item, service, or any other sanctions or compliance concern should alert to investigate the activity in accordance with this Policy.
- There are a number of issues, which should cause us to conduct further investigation into whether a particular transaction or relationship may present a potential economic trade sanctions regulation issue.

3.1 HARLOW employees and contractors shall look out for any red flags or suspicions that may indicate direct or indirect involvement of a restricted territory, sanctioned party, controlled item, service, end-user or any other sanctions compliance concern.

3.2 Some examples of red flags to be reported include:

- The customer is reluctant to offer information or clear answers on routine commercial issues (including intended geography of sales, beneficial ownership, or locations of operation);
- The customer has a different name or location than the customer or ultimate end user;
- The counterparty is evasive about its customers;
- Unusual invoicing, shipping, or packaging requests;
- Unusual volume requests compared to the anticipated size of the market;
- Unusually favourable payment terms or cash payments;
- Any suspicion or evidence to suggest the possible involvement of a Restricted Territory or Restricted Party;

The above is not intended to be an exhaustive list. Any suspicion of the direct or indirect involvement of a restricted territory, restricted party, controlled item, service, end-use or any other sanctions compliance concern should alert you to further investigate the activity in accordance with this Policy.

4. SCOPE OF RESPONSIBILITIES OF COMPLIANCE DEPARTMENT VIS-À-VIS ML&CFT

- To Monitor economic trade sanctions regulations and update the business in case of any change
- Embargos and sanctions screening
- Determine and approve controls to be followed in specific regions or types of transaction
- Provide technical advice and guidance on specific situations on request, including on resolution of issues and follow up of red flag
- Conduct periodic risk assessments in high risk regions and monitor the processes and controls in place.

- Conduct effective training and education to relevant business functions in relation to economic trade sanctions regulations
- Ensure that HARLOW Group financial transactions/operations (including contact with financial institutions, usage of certain currency, segregation of funds) are in line with economic trade sanctions regulations, by following approved processes and controls
- Conduct due diligence checks on vendors e.g. Specially Designated Nationals and Blocked Persons Lists searches required for sanctioned countries/entities and individuals; and
- Ultimately responsible for ensuring the Group activities will comply with economic trade sanctions regulations, setting the right tone and providing appropriate support for the Group activities
- Ensure that all employees, contractors, and other third parties acting on the company's behalf are versed with, properly trained and comply with economic trade sanctions regulations, following approved processes for compliance with economic trade sanctions regulations.
- To monitor compliance with the Group policies and procedures pertaining to Sanctions ML& CFT to ensure they are effective. Tools used to monitor compliance including:
 - File audits
 - Senior management review of reports provided by the Legal Manager.
 - Identifying lack of compliance and formulating solutions

5. DUE DILIGENCE

- DUE Diligence Procedure is an important tool to prevent sanctioned & ML/CFT clients being in any kind of business with HARLOW in addition to setting continuous screening methods and corrective actions.
- HARLOW has established standards regarding Know-Your-Customer ("KYC"). These standards require due diligence on each prospective customer before entering into a business relationship via identification and verification of his identity and, as the case may be, his representatives and beneficial owners on the basis of documents, data or information obtained from a reliable and independent source compliant with the laws and regulation. [Due Diligence Process Exhibit No.2 and KYC FORM Exhibit No.3].
- The form of "Know Your Client" shall be submitted by clients by an authorised signatory along with the requested corporate documentation for HARLOW's screening.
- Upon COMPLIANCE Department approval, the rest of formalities involving contractual parties' obligations shall take place as per the other related procedures.

Compliance Department shall maintain KYC records for every client where the same shall be kept is safe as long as the relationship with HARLOW is valid and for not less than 10 years after the relationship is being terminated.

The KYC Form shall be updated immediately whenever any of the following events occur:

1. Change of ownership and/or shareholding restructuring.
 2. Change of management and organisation chart and/or its matrix of authority.
 3. a resolution for the bankruptcy, insolvency, winding-up, liquidation or similar proceedings relating to Buyer has been passed by the shareholders of the client.
 4. a trustee, liquidator, custodian or similar person in a proceeding relating to the client has been appointed, and such appointment has not been set aside or stayed within sixty (60) Days of such appointment; or
 5. a court or Government Authority having competent jurisdiction has made an order or otherwise confirming the bankruptcy or insolvency of the client, and such order has not been set aside or stayed within sixty (60) Days of issuance.
- **Accordingly:** HARLOW will not accept customer relations with persons or entities not meeting the above acceptance criteria, or whose legitimate intentions do not immediately appear to be sufficient or included in the US or European Union lists of persons or entities under financial sanction, or carrying on a commercial activity which is considered by HARLOW as particularly at risk with respect to ML&CFT.
 - HARLOW shall not authorise the opening of anonymous accounts.
 - Due diligence is a continuous exercise. thus, HARLOW shall ascertain that its contractual relationships with third parties, suppliers, contractors, partners throughout the precontracting phase, during the contract tenure and post contract phase are Sanctions, MTL&CFT oriented, risk free and in full compliance with applicable laws and regulation throughout the relationship life cycle stager and as more clearly specified in Exhibit No.1.
 - Moreover, HARLOW Group imposes this policy's requirements to all it contractors, service providers and vendors. Such AML, CFT and sanction requirements shall extend as far as possible to cover all pre contractual, post contractual and whilst contracting phases and shall be as per the specimen clause shown un Exhibit No.2.

6. ORGANIZATION OF INTERNAL CONTROL

6.1 Suspicious transactions reporting:

In its internal procedures, HARLOW shall describe in precise terms, for the attention of its staff members, when it is necessary to report and how to proceed with such reporting. Reports shall be analysed by the Legal Manager in accordance with the precise methodology fully described in the internal procedures.

6.2 General reporting requirements

- Any unusual or inconsistent transaction with the known legitimate business and the description of the risks to the client is not in itself suspicious. In this context and in addition to the items mentioned in clause No.3 hereabove, the company should consider the following:
 - 1- If the transaction does not include an economic or legitimate purpose that is clear or apparent.
 - 2- If the transaction does not include a reasonable explanation.

- 3- If the volume or pattern of the transaction is different from the pattern or volume of previous transactions for the same clients or similar clients.
 - 4- If the customer has failed to give a full explanation of the transaction or to give complete information about it.
 - 5- If the transaction results from a newly established business relationship, or if it is a single terminated transaction.
 - 6- If the transaction includes the use of accounts or companies outside the borders that are not justified by the client's economic needs.
 - 7- If the transaction involves the unnecessary passage of funds through third parties.
 - 8- The above list of possibilities is not exhaustive, and the fuel company can research any other related issue in order to assess whether the transaction is of an unusual or inconsistent nature.
- 6.3 Depending on the result of this examination and on the basis of the information gathered, the Legal Manager:
- will decide whether it is necessary or not to send a report to the concerned authority.
 - will decide whether or not it is necessary to terminate the business relations with the customer.
- 6.4 Record keeping:
Records of data obtained for the purpose of identification must be kept for at least ten years following the carrying-out of the transactions or the end of the business relationship.
- 6.5 Training:
HARLOW has developed different ways of training and awareness in order to keep its staff aware of the AML/CFT duties.
- 6.6 Auditing:
Internal audit regularly establishes missions and reports about AML/CFT activities.

7. GOVERNANCE DOCUMENTS

Compliance Department Manager is the custodian of the following governance documents. The responsibility of preparing, updating the documents rests with Legal Department. The lists of documents are as follows:

- (i) Due Diligence reports
- (ii) Policy and Procedures
- (iii) Training Materials
- (iv) Lists of clients along with sufficient supporting documents for every customer.

8. COMPLIANCE CONTROLS

The responsibility to provide HARLOW employees and contractors with the necessary information to comply with this Policy falls with Legal, Finance and the Procurement Department as below:

Legal Department shall:

- Monitor economic trade sanctions regulations and update the business in case of any change.
- Determine and approve controls to be followed in specific regions or types of transaction.
- Provide legal advice and guidance on specific situations on request, including on resolution of issues and follow up of red flag.
- Conduct periodic risk assessments in high risk regions and monitor the processes and controls in place.
- Conduct effective training and education to relevant business functions in relation to economic trade sanctions regulations.

Finance

- Ensure that financial transactions/operations (including contact with financial institutions, usage of certain currency, segregation of funds) are in line with economic trade sanctions regulations, by following approved processes and controls;
- Conduct due diligence checks on vendors e.g. Specially Designated Nationals and Blocked Persons Lists searches required for particular countries; and

Procurement

- Ensure that suppliers are aware of the HARLOW Global Sanctions Regime and monitor compliance on an ongoing basis.

9. EMPLOYEE RESPONSIBILITY

Every Employee is obliged to read and follow this Policy, to understand and identify any red flags that may arise in your business activities and to escalate potential compliance concerns related to sanctions to the Legal Manager. You should not take any actions prior to receiving advice and/or instructions.

10. UPDATES, REVIEW AND OWNERSHIP

This Policy may be updated from time, and the updated version of the Policy will be immediately made available on the HARLOW platform of policies.

CHAPTER TWO
SPECIAL REGULATIONS VIS-A-VIS
SANCTIONS ADMINISTRATION

1. AML Duties of the Legal Manager:

The Legal Manager shall co-ordinate, communicate and liaise with the external AML service provider in order to receive record and manage an updated sanctions list and any amendment /edits thereof as received from the Security Consent of the United Nations through the Ministry of Foreign Affairs.

- The Legal Manager shall co-ordinate, communicate and liaise with the listing official and the National specialised AML advisors in order to receive the national and regional sanction lists, if any.
- The Legal Manager shall, after acquiring any and all sanction lists or any sanction entity or individual, disseminate the same amongst HARLOW Group Concerned Departments.
- Receive, investigate and evaluate reports of internal suspicious operations of HARLOW and its subsidiaries.
- Monitor the relevance and effectiveness of the company's training program on policy.
- The Legal Manager is to ensure a periodic review of the INTERNATIONAL listings shall also surf the internet for the following links to acquaint himself of the international sanction lists:
 - Sanctions list for The Islamic State of Iraq & the Levant (ISIL) And AL-Qaeda:
https://www.un.org/securitycouncil/ar/sanctions/1267/aq_sanctions_list
 - Taliban sanctions list:
<https://www.un.org/securitycouncil/sanctions/1988/materials>
 - List of sanctions related to North Korea's readiness:
<https://www.un.org/securitycouncil/sanctions/1718/materials>
 - List of sanctions related to the Iranian nuclear issue:
<https://www.un.org/securitycouncil/content/2231/list>
 - Consolidated Security Council sanctions list:
<https://www.un.org/securitycouncil/ar/content/un-sc-consolidated-list>
 - U.S. Treasury Department Foreign Assets Control (OFAC) Sanctions List:
<https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>
 - HARLOW may, if it deems the same expedient, create a software application for the identification of sanctioned persons and the ascertainment of their identities.

2. Reporting Obligations:

- 2.1 All officials and employees of the company are obligated to report when they have reasonable reasons that lead them to suspect that the funds that are being passed through the company are proceeds of criminal activity or related to financing terrorism or that they will be used for terrorism or to carry out terrorist acts or by the terrorist organization.
- 2.2 The officials and employees of the company must urgently submit an internal report on the suspicious transaction to the Legal Manager.
- 2.3 Internal reports on suspicious operations must be prepared and submitted to the Legal Manager regardless of the size of the transaction.
Upon receiving internal reports from company officials or employees, the Legal Manager must do the following:
 1. Document the report in an appropriate and appropriate manner.
 2. Giving the official or employee a written acknowledgment of the report.
 3. Treating the internal report in light of all other relevant information available to the company and taking decision on whether the transaction is suspicious or not, and giving the official or employee a written notification of the decision of the reporting officer.
- 2.4 If the Legal Manager knows, suspects, or has reasonable grounds to know or suspect that the funds are proceeds of criminal activity, or that they are related to terrorist financing, or will be used for terrorism or terrorist acts or by the terrorist organization, a further preventive order is required to be issued along with supportive report.
- 2.5 The contents of the report;
 1. The facts or circumstances on which the company relied on knowledge or suspicion.
 2. The basis on which the company has relied on knowledge and suspicion.
 3. Further action implemented in this regard.
 4. Record keeping in a special record.

EXHIBIT NO. 1

Scope & Applicability

Third Party types: Customers, Suppliers/Contractors, Partners, including ownership (parent company/s, ultimate beneficial owners) and operatorship.

Expectations

Manage compliance to applicable laws and regulations throughout the Third-Party relationship lifecycle stages,

1- Pre-contract, Initiating the relationship with Third Parties, to Include:

- Planning controls:
 - Determining applicable sanctions regimes/programs and export controls (for dual-use, controlled goods). Policies & procedures for Compliance Risk Management, Incl. Risk Register to support risk Identification, evaluation, analysis and mitigation, reporting and follow-up.
 - Know Your Third Party (KY3P) - KYC as per the attachment.
- Due diligence for registration and onboarding Third Parties - Due diligence process controls:
 - Procedures for Third Party sanctions screening, including ownership (parent company/s, ultimate beneficial owner(s)).
 - Technology/s for Third Party sanctions screening, covering all applicable sanctions programs and regimes including "but not limited to" UN, U.S., EU and UK.
- Contracting with Third Parties - Contracting controls:
 - Sanctions contract clauses covering all applicable sanctions programs and regimes including "but not limited to" UN, U.S., EU and UK.

2- Whilst contracted, actively managing the relationship with Third Parties, to Include:

- Ongoing monitoring controls whilst performing (PLAN/DO):
 - Regulatory/ compliance watch, to ensure that monitoring of changes in law/regulatory requirements.
 - Awareness and training resources on compliance subject matters, as applicable including trade compliance, export controls, sanctions and refusal.
- Ongoing monitoring controls to evaluate and improve (CHECK/ACT):
 - Policies & procedures for compliance with applicable laws and regulations.
 - Procedures for transactional Third-Party sanctions screening.
 - Procedures for periodic. Planned/scheduled Third Party sanctions screening.

- Technology/s for Third Party sanctions screening, covering all applicable sanctions programs and regimes, including “but not limited to” UN, U.S., EU and UK
- Independent reviews for non-compliance, I investigations and lessons I earnt.

3-Post-contract: Closing the relationship with Third parties, to include;

- Non-compliance incident reviews, I investigations and lessons I earnt.
- Procedures for Third Party suspension, disqualification and termination.

4-Enabling oversight &. Accountability, to include:

- Clearly established. Assigned and documented roles & responsibilities.
- Periodic compliance performance reporting to Management.

5-Provide documentation & reporting to Include:

- Documenting Third Party relationships-controls:
 - Accurate business. Records: KYC, sanctions screening record contract clauses, terms & conditions; investigation records, Reviews and audit records.
 - "Reporting: compliance and non-compliance incidents and Investigations.

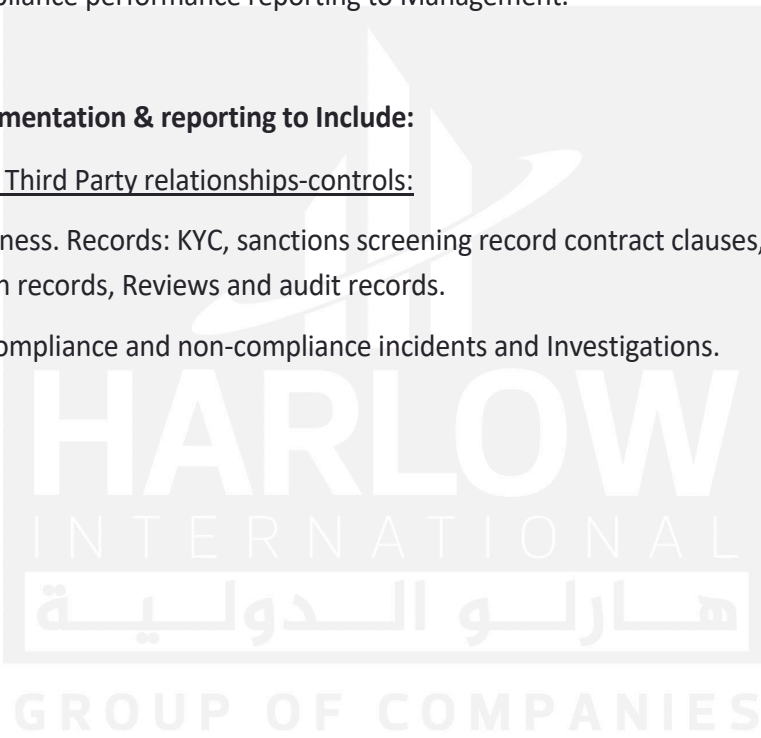


EXHIBIT NO. 2

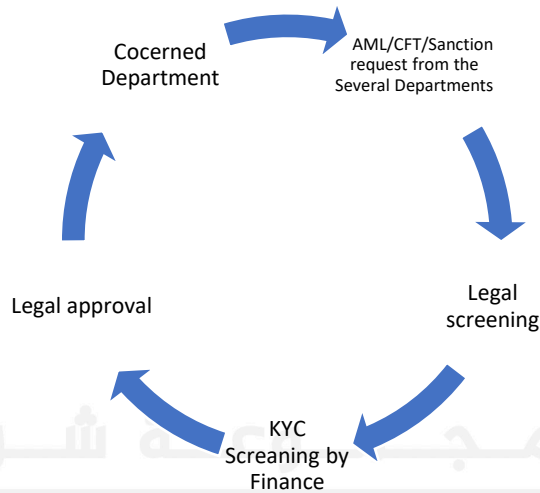
1. DUE DILIGENCE PROCESS

- **Step 1: asking for essential user data:** Every customer due diligence begins by obtaining basic information about the client. These are not necessarily equal across jurisdictions.
 - Full name of individual/entity
 - Residential address/Premises address
 - Contact number and an email address
 - Nationality
 - Government-issued identification and tax number- CR
 - Specimen of signatory.Once these basic data are submitted, a business can analyze it and figure out which way to go next.
- **Step 2: data screening:** Data screening is the next stage of performing customer due diligence. Customer data is checked via name-screening Automated databases used to evaluate the risk category.

The formal screening of customers on entry into commercial relations is a vital element, both for the regulations relating to money laundering and for the KYC form. This identification shall identify Each customer (each individual person and/or each person involved in the case of a legal entity) stake-holding structure.
- **Step 3: Ongoing Screening:** Finally, as KYC does not involve static data, but dynamic data through the relationship with the customer, it also needs follow-up and ongoing monitoring of the customer. Any HARLOW staff member must inform the Legal Manager of any atypical transactions which they observe and cannot attribute to a lawful activity or source of income known of the customer.

INTERNATIONAL
هارلو الدولية
GROUP OF COMPANIES

2. PROCEDURES PROCESS DIAGRAM



3. Customer/Supplier acceptance policy: Several elements require the establishment of a customer acceptance policy, in particular:

- accepting as customers only persons and entities with which HARLOW may and wishes to develop commercial relations, and who correspond to HARLOW's current business model, ambitions and means.
- ensuring that the concerned employee has a good knowledge of the customer (KYC) and can exercise the due diligence appropriate to their level of risk from the start of the customer relations.
- avoiding HARLOW entering into business relations with persons who might involve it in money laundering or terrorism financing transactions.
- meeting legal / regulatory requirement.

EXHIBIT NO. 3

KNOW YOUR CLIENT (KYC) PROFILE FORM FOR BUSINESSES/ORGANISATIONS

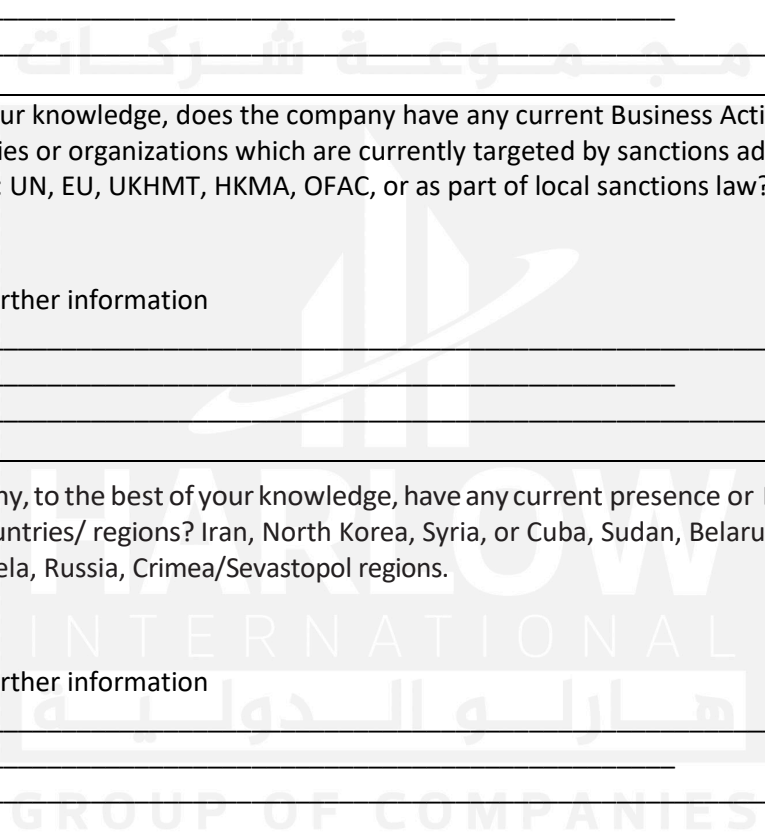
PART A. CORPORATE INFORMATION			
A1	Company legal name		
	Legal form		
	Taxpayer identification number (TIN)		
	Registered Office		
	Head Office Address		
	Phone		Fax
	E-mail		
	Country of Incorporation		
	Date of Incorporation		
	Number of employees		
	Contact persons, their e-mails, and phones		
A2	Please enclose copies of your Company registration/incorporation certificates.		
PART B. BUSINESS INFORMATION			
B1	Nature and Purpose of Business: Manufacturing Wholesale Trading Import/Export Retailing IT Banking Insurance Medical Service Industry (Please specify) Mass media Others (Please Specify)		Please Specify "Nature and Purpose of Business" in detail
	B2	Country/s of provision goods/works/services or rights by the Company	

PART C. STRUCTURE OF OWNERSHIP	
C1	<p>Does the Company belong to any holding structure / group of companies?</p> <p>NO YES</p> <p>If YES, complete the information below about holding structure / group of companies which the Company belongs to and specify the place of the Company in such holding structure / group of companies:</p>
	<p>Name of holding structure / group of companies</p>
	<p>Place of the Company:</p> <p>Parent company Subsidiary Affiliate</p>
PART D. FINANCIAL AND RISKS INFORMATION	
D1	<p>Have any of the Company's assets currently been under seizure, attachment, or similar proceedings?</p> <p>NO YES</p> <p>If YES, provide a list of these assets and further explanation</p> <p>_____</p> <p>_____</p> <p>_____</p>
D2	<p>Is your Company in process of winding up, liquidation or bankruptcy?</p> <p>NO YES</p> <p>If YES, provide further information</p> <p>_____</p> <p>_____</p> <p>_____</p>
D3	<p>Does your Company have any tax or other indebtedness?</p> <p>NO YES</p> <p>If YES, provide further information</p> <p>_____</p> <p>_____</p> <p>_____</p>

D4	Has the Company currently been under investigation in connection with charges of fraud, corruption, tax evasion, and violation of customs legislation?
	NO
	YES
	If YES, provide further information: _____ _____ _____



PART E. SANCTIONS FOR THE PURPOSES OF THIS PART E, THE FOLLOWING DEFINITIONS SHALL APPLY: "Business activity" means operations, suppliers, customers, agents, origin or shipping of goods and interactions/exposure to state owned or controlled entities, investments in bonds and/or securities. "Connected Parties" include but are not limited to, beneficial owners, key controllers, trustees, settlors/grantors/founders, protectors, and beneficiaries "Presence" means an entity that has its registered office address, business address, correspondence address, or principal place of operations in one of the locations provided.	
E1	To the best of your knowledge, is the company or are any of the company's Connected Parties currently targeted by sanctions administered by the following bodies: UN, EU, UKHMT, HKMA, OFAC, or as part of local sanctions law? NO YES If YES, provide a list of these assets and further explanation _____ _____ _____
E2	To the best of your knowledge, does the company have any current Business Activity involving individuals, entities or organizations which are currently targeted by sanctions administered by the following bodies: UN, EU, UKHMT, HKMA, OFAC, or as part of local sanctions law? NO YES If YES, provide further information _____ _____ _____
E3	Does the company, to the best of your knowledge, have any current presence or Business Activity in the following countries/ regions? Iran, North Korea, Syria, or Cuba, Sudan, Belarus or Zimbabwe, Ukraine, Venezuela, Russia, Crimea/Sevastopol regions. NO YES If YES, provide further information _____ _____ _____
E4	Does the Company have Sanction compliance policies and procedures in place that a regularly reviewed and updated to reflect changes in Sanctions laws and requirements for UN, EU, UKHMT, HKMA, OFAC? NO YES If YES, provide further information: _____ _____ _____



PART F. AML PROCEDURES AND CONTROLS	
F1	Do you have written policies to prevent money laundering and financing terrorism? NO YES
F2	Does the policy reflect a regular process to identify categories of suspicious activity by monitoring customer transactions? NO YES
F3	Does the policy reflect a process to notify appropriate government/supervisory authorities regarding suspicious activity? NO YES
F4	Do you monitor and evaluate clients for sanctioned entities and countries before entering into business relationships? NO YES
PART G. VERIFICATION & DECLARATION	
<p>We hereby declare that the information and documentation provided in this form is current, correct and complete. We (the company) hereby agree to provide permission and consent for all related information required by HARLOW and its subsidiaries for the purpose of registration assessment etc.</p> <p>We also declare that our company has not been blacklisted by any Vendor, Bank or any institution or Government Entity.</p> <p>Company Representative (Name) _____</p> <p>Company Representative (Position) _____</p> <p>Company _____</p> <p>Signature _____ Date _____</p>	