

PROCESSING FEE

To carry out the compliance procedure and to become an approved client of SUISSE BANK PLC ("SB") we will charge you a one-time non-refundable processing fee in the amount of 5,000.00 EUR (Five Thousand Euro).

APPLICANT DETAILS

Please provide the following information, so that SB can process your application.

THE APPLICANT IS A:

(1) PERSON

(2) COMPANY

(1) IF THE APPLICANT IS A PERSON:

Title (Mr/Mrs/other):

Forename(s):

Surname:

Former Name(s):

Nationality:

Date of Birth:

Current Address:

Street / Building No.:

Address Addition:

Postal Code / City:

Country:

Mobile Number:

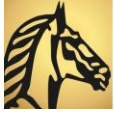
E-mail:

Previous Address (if resident at current address less than 3 years):

Street / Building No.:

Postal Code / City:

Country:



(2) IF THE APPLICANT IS A COMPANY:

Company Name:

Company Registration Number:

Date of Incorporation:

Nature of Business:

Regulated by:

Registered Address:

Street / Building No.:

Postal Code:

City:

Country:

Full names and residential addresses of all Directors:

(Please continue on a separate sheet if necessary)

DIRECTOR ONE:

Forename(s) / Surname:

Street / Building No.:

Postal Code / City:

Country:

Phone Number:

Mobile Number:

E-mail:

DIRECTOR TWO:

Forename(s) / Surname:

Street / Building No.:

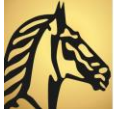
Postal Code / City:

Country:

Phone Number:

Mobile Number:

E-mail:



NAME OF APPLICANT
(Person or Company, further the “**Applicant**”).

The Applicant hereby covenants with SB that with effect from the Admission Date the new approved client will be bound by and will observe and perform every provision of this Application.

1. Amendment of this Application

SB shall be at liberty to amend or change, if they deem it necessary or desirable, the terms of this Application at any time and without giving notice of or to any Applicants.

2. Terms and Conditions

If at any time whilst this Application remains in force any of its provisions are found to conflict with the Terms and Conditions of SB, the provisions of the Terms and Conditions shall prevail.

3. Governing Law and Dispute Resolution

This Application shall be governed and construed in all respects in accordance with law of the Union of the Comoros. Any dispute arising out of or in connection with the Application shall be governed by the exclusive jurisdiction of the Courts of Comoros and by entering this Application the Applicant irrevocably submits to the jurisdiction of the Courts of Comoros.

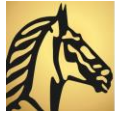
4. Applicant Admission Date

The Applicant’s details having been received and verified on the date shown below.

Signed as a deed by:

SIGNATURE OF APPLICANT

Date:



**SUISSE BANK PLC (“SB” or the “Banking Institution”)
Policy for Combating Financial Crime**

SB is committed to the prevention of financial crime and has adopted procedures to detect and deter money laundering, terrorist financing or other illegal activities.

It is our policy to deter and, where we can, prevent, the use of SB as a conduit for illegal money laundering activities. Our staff can only implement this policy if they understand the background to it and how it works in the context of our day-to-day business. The success of our policy depends on **the vigilance of everyone**.

In order for these policies to be effectively implemented, the Banking Institution and its entire staff need to be:

1. Informed about the **legal and regulatory framework** and the serious legal and regulatory **penalties** for assisting in financial crime – even unwittingly- in every jurisdiction from which we operate;
2. Alert to the **practical methods** by which criminals seek to commit financial crimes;
3. Aware of the need to **report any suspicions promptly** to SB management.

Legal and Regulatory Framework

The Union of the Comoros is a member of Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG).

The purpose of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) is to combat money laundering by implementing the FATF Recommendations. FATF – the Financial Action Task Force – is an inter-governmental body whose purpose is the development and promotion of policies, both at national and international levels, to combat money laundering and terrorist financing.

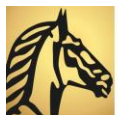
This effort includes co-ordinating with other international organisations concerned with combating money laundering, studying emerging regional typologies, developing institutional and human resource capacities to deal with these issues, and co-ordinating technical assistance where necessary. ESAAMLG enables regional factors to be taken into account in the implementation of anti-money laundering measures.

ESAAMLG members participate in a self-assessment process to assess their progress in implementing the FATF Forty Recommendations.

The Union of the Comoros is also an observer member of the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) to give support in matters relating to anti-money laundering and combating the financing of terrorism (AML/CFT).

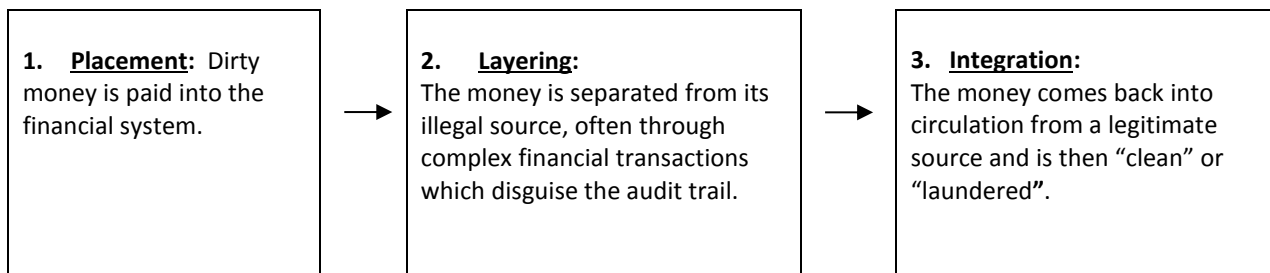
GIABA is an institution of the Economic Community of West African States (ECOWAS) responsible for facilitating the adoption and implementation of Anti-Money Laundering (AML) and Counter-Financing of Terrorism (CFT) in West Africa. It is also a FATF-Styled Regional Body (FSRB) working with its member states to ensure compliance with international AML/CFT standards.

Further information in this regard which forms the basis of SB’s policy can be found at the below link: [FATF 40 Recommendations and FATF 9 Special Recommendations](#).



What is Money Laundering?

The process by which criminals attempt to change the identity of “dirty” money (obtained through crime) by “laundering” it so that its true source cannot be traced. Whilst there is no single method of money laundering, there are generally three stages:



Funding or facilitating money laundering and using laundered money are all **criminal offences**. Additional offences connected with money laundering include:

- assisting in;
- concealing;
- tipping off;
- failing to report money laundering.

Any individual can commit these offences if they know (or should have known, measured by the standard of the reasonable person in their position) that the money is from an illegal source. These offences are punishable by unlimited fines and imprisonment.

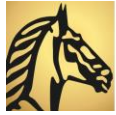
The Importance of Know Your Customer (“KYC”)

At SB we only offer our services (e.g., issue of guarantees) to legal entities (individuals or corporate) who have become approved clients of SUISSE BANK PLC. A potential client is required to go through a thorough verification exercise so that we can establish that they are legitimate.

Although our approved clients are, in general, introduced through agents, it is SB and not the agent who has the responsibility of verifying the identity and legitimacy of the prospective client. As a number of our agents are located in countries which are regarded for money laundering purposes as higher risk – such as Africa and India - we have adopted a high standard for required documentation before a client application will be accepted. This is detailed in the Compliance Agreement.

We additionally check all potential client applicants against international sanctions lists. This verification is completed before we accept the one-time non-refundable processing fee for the compliance procedure.

Our vigilance does not stop upon the admission of a client. Before accepting an application from a client for a guarantee or similar credit, we require documentary proof from the client of the legitimate commercial nature of the business or contract which is to be guaranteed. This is because we recognise that the risk to SB of being used for improper purposes as described in the examples below.



Practical Guidance on how to detect and deter Financial Crime

It is trite (but true) to say that someone who is intent on illegal activity such as money laundering will not introduce themselves to us in those terms. Whilst generalisations are not always useful, red flags to a suspicious transaction or illegal activity can include:

- Lack of obvious commercial rationale
- A “front man” or “front company” who doesn’t appear in the corporate structure
- Lack of documentary support for a person or transaction
- Excessive concern about secrecy, especially surrounding source of funds.

Example 1: Imagine that SB is approached by a client (properly verified by us) who now wants a commercial guarantee but cannot produce a third-party contract.

- Before entering into the transaction, we need to verify the legitimacy of the proposed transaction whether directly or through our or their professional advisors. **Why?**
- Because the Applicant is keen to enter into a transaction with us to pay a premium for a guarantee but can’t show why he needs it – the transaction doesn’t make obvious commercial sense.

Example 2: Imagine that the guarantee is called by the Beneficiary and the Applicant is eager to pre –fund the guarantee in full.

- The Applicant may have spotted a market opportunity that we haven’t seen or is not available to us or they may be “Layering” - using dirty money to buy a clean asset which they can sell on in return for clean money. The Applicant pays SB the guarantee money (which they had all the time); SB pays the Beneficiary with its own clean money and the money is successfully laundered.

Record Keeping

SB recognises the importance of keeping full and accurate records of the steps taken by us to verify our approved clients and Applicants. All original documentation is maintained in paper or electronic form for as long as a person remains a client and for 6 years thereafter.

Reporting Suspicions to Management

At SB, the Money Laundering Reporting Office (“MLRO”) is a member of senior management with the specific responsibility of overseeing the implementation of our policies to prevent financial crime. The MLRO reports directly to the Board of SB.

The Banking Institution and each individual member of staff are required by law to report suspicious transactions, via the firm’s MLRO, to ESAAMLG.

The individual obligation is satisfied by promptly reporting your suspicions to the MLRO.



Scope of Compliance Lists

SB is using following sources in combination with this agreement:

- PEP List: official government websites (presidencies, governments, legislators, courts, military, administration, etc.) and official publications (e.g.laws, decrees).
- Sanctions List : EU, United Nations, OFAC SDN, OFAC Palestine, HM Treasury and special measures.
- Watch List & Black List: authorities, ministries and BaFin unauthorised transactions.

Training for Staff

SB is responsible for making sure that our staff:

- know what money laundering is and how we might be used to facilitate this,
- understand the need to monitor the approved client and oversee the applicant's processes,
- know how to identify and report suspicious transactions.

With this in mind we conduct periodic refresher training for our staff.

The MLRO or other senior management are on hand to answer any questions or deal with concerns on this topic.

Signed as a deed by:

SIGNATURE OF APPLICANT

Date: