

Anti-Money Laundering Policy



December 2024

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1. Introduction

Mannai Corporation QPSC (hereinafter referred as the “Company”) is committed to conduct business in compliance with the principles established in its Code of Business Conduct & Ethics, its values, and the applicable laws and regulations.

The Anti-Money Laundering (AML) Policy defines the Company’s position with respect to the prevention of money laundering and terrorism financing.

2. Purpose

The purpose of this AML Policy (“the Policy”) is to uphold the highest ethical standards and ensure compliance with relevant Anti-Money Laundering and Counter-Terrorism Financing (CTF) laws, safeguarding the Company’s reputation and promoting a culture of integrity in all its transactions.

3. Scope

This AML policy applies to all employees and anyone doing business with the Company, including partners, vendors, consultants, agents, intermediaries, and other third parties involved in financial transactions on behalf of Company.

All individuals are required to fully comply with the requirements of this Policy, refraining from engaging in or assisting any activities that violate its standards or applicable AML and CTF laws.

This Policy should be read in conjunction with Code of business conduct other policies of the Company such as:

- Code of Business Conduct and Ethics
- Whistleblowing Policy and Procedures

4. Definitions

Money laundering involves the concealment of its origins of illegally obtained funds by converting it into a legitimate source. This is generally done by:

- Placement: Introducing illicit funds into the financial system.
- Layering: Moving funds through multiple accounts to obscure its origins.
- Integration: Re-entering the laundered funds into the economy as legitimate assets.

Counter terrorism financing are efforts to detect and prevent funds from being used to support terrorist activities. CTF efforts focus on tracking suspicious financial flows, identifying high-risk individuals and entities, and implementing controls to block terrorist funding.

Examples of such activities may include but are not limited to:

- Converting or transferring funds, knowing they come from a crime, to hide their illegal origin or help someone evade legal consequences.
- Hiding or disguising the nature, source, location, or ownership of funds known to be proceeds of crime.
- Acquiring, possessing, or using funds while aware they are proceeds of crime.
- Participating in, assisting with, or planning any activities related to these actions, including attempts or conspiracies.

5. Policy statements

- The Company upholds a zero-tolerance approach regarding money laundering and terrorism financing and prohibits all employees and relevant stakeholders to engage in these illegal practices.

- The Company is committed to comply with applicable anti-money laundering regulations wherever it conducts business. It will only perform financial transactions with verified recipients and financial institutions for legitimate and substantiated transactions and in accordance with properly executed contractual commitments.
- The Company will ensure that rigorous due diligence is undertaken on all customers, suppliers and business associates to prevent transactions with illicit sources.
- All employees and relevant stakeholders must ensure that they are aware of their responsibilities under this policy and their obligation to immediately report all suspected activities related to money laundering and terrorism financing.

6. Reporting procedures

- Employees and business partners are required to immediately report any suspicions regarding the source or legitimacy of funds to the Mannai Legal Department and Compliance Team on compliance@mannai.com.qa.
- The Company shall obtain written statements during the investigation process from all relevant persons who are being interrogated with the incident of Money Laundering and such relevant persons shall be allowed to review their statements recorded upon completion and shall sign the statement acknowledging their statement.
- The Investigation officer/team shall submit their written report to the Management, which shall be signed by the Investigation officer/team upon completion of the investigation process.

7. Corrective actions

Non-compliance with this Policy may result in disciplinary action, up to and including termination and possible legal proceedings. For external stakeholders, such as customers, partners, or vendors, non-compliance can lead to contractual termination, legal claims, or other actions as deemed appropriate by the Company in line with the regulatory requirements.

8. Effective Date

This Policy will come into effect from the date of its publication on the Company's Website.

Approvals

Santhosh Krishnamoorthy CFO	
Alekh Grewal Group CEO	
H.E. Sheikh Khalifa Bin Abdullah Al Thani Chairman – Audit Committee	
H.E. Sheikh Suhaim Bin Abdullah Al Thani Vice Chairman – Board of Directors	
On behalf of the Board of Directors	