



# Anti money laundering policy

## 1. Introduction

PDynamics ("we," "us," or "our") is committed to preventing money laundering and terrorist financing activities. This Anti-Money Laundering (AML) Policy outlines our procedures and practices to detect, prevent, and report suspicious activities, ensuring compliance with applicable laws and regulations.

## 2. Objectives

Our AML Policy aims to:

- Prevent and detect money laundering and terrorist financing activities.
- Ensure compliance with relevant laws and regulations.
- Safeguard the integrity of our operations and reputation.
- Provide a framework for identifying, managing, and mitigating AML risks.

## 3. Regulatory Compliance

PDynamics complies with all applicable anti-money laundering laws and regulations in the jurisdictions where we operate. This includes but is not limited to the implementation of measures prescribed by [Relevant Jurisdiction] and international standards set by organizations such as the Financial Action Task Force (FATF).

## 4. Customer Due Diligence (CDD)

We conduct thorough Customer Due Diligence (CDD) to verify the identity of our clients and assess the risk of money laundering or terrorist financing. This includes:

- **Identity Verification:** Collecting and verifying identification documents, such as passports or driver's licenses.
- **Risk Assessment:** Assessing the risk level of each client based on factors such as their business activities, geographic location, and transaction patterns.
- **Ongoing Monitoring:** Continuously monitoring client transactions to ensure they are consistent with their profile and expected activity.

## 5. Enhanced Due Diligence (EDD)



Enhanced Due Diligence (EDD) is applied to higher-risk clients, including politically exposed persons (PEPs) and clients from high-risk jurisdictions. EDD measures include:

- Obtaining additional information about the client's source of funds.
- Conducting more frequent reviews of the client's transactions.
- Implementing additional controls to mitigate risks.

## **6. Suspicious Activity Reporting**

We are obligated to report any suspicious activities or transactions that may involve money laundering or terrorist financing to the relevant authorities. Suspicious activity may include, but is not limited to:

- Unusual or unexplained patterns of transactions.
- Transactions that are inconsistent with a client's known business or personal activities.
- Transactions involving high-risk jurisdictions or large sums of money without a clear source.

## **7. Record Keeping**

PDynamics maintains comprehensive records of all client transactions, identification documents, and AML compliance measures. These records are kept for a minimum of [X] years and are readily accessible for review by regulatory authorities if required.

## **8. Employee Training**

All employees are required to undergo AML training to understand and identify potential money laundering and terrorist financing activities. Training includes:

- Recognizing suspicious activities.
- Understanding the legal and regulatory requirements.
- Implementing internal AML procedures and controls.

## **9. Internal Controls and Procedures**

We have established internal controls and procedures to support our AML Policy, including:

- Designating an AML Compliance Officer responsible for overseeing and implementing the AML program.
- Conducting regular audits and reviews of our AML procedures.
- Implementing a whistleblower policy to report potential violations of our AML Policy.

## **10. Policy Review**



Our AML Policy is reviewed periodically and updated as necessary to reflect changes in regulations, industry standards, and internal practices. All updates are communicated to employees, and training is provided as required.

## **11. Contact Information**

For any questions or concerns regarding our AML Policy, please contact our AML Compliance Officer at:

PDynamics LTD  
29 Finsbury Circus, London, EC2M 5SQ, United Kingdom  
[compliance@pdynamics.com](mailto:compliance@pdynamics.com)