

Anti–Money Laundering Policy V2 May 2023

Introduction

The OT Group Limited (“OTG”) recognize the importance of preventing money laundering and terrorist financing and is committed to the highest standards of Anti-Money Laundering and Combating Terrorist Financing (“AML/CTF”).

Our aim is to have robust policies and procedures for the prevention of money laundering and terrorist financing and to protect the Company’s and our employees’ reputations and integrity.

Scope

Money Laundering is the process of any activity by which criminally obtained money or other assets (criminal property) are exchanged for “clean” money or other assets with no obvious link to their criminal origins.

Criminal property may take any form, including money or money’s worth, securities, tangible property and intangible property.

Terrorism Financing is defined as providing, depositing, distributing or collecting funds, directly or indirectly, intended to be used, or knowing that these funds are to be wholly or partially used, for the committing of terrorist act(s).

This Policy is aimed to prevent any company or individual from using OTG for money laundering or terrorist financing activities.

Policy

- OTG shall comply with any laws and regulations related to preventing AML/CTF that apply.
- OTG shall not accept any customers or transactions involved with AML/CTF.
- OTG shall establish an appropriate framework to prevent AML/CTF.

Management Framework

- In order to establish an appropriate framework to prevent AML/CTF, OTG shall implement the following measures:
 - Appropriate policies and procedures relating to customer due diligence.
 - Training appropriate employees to ensure they understand the importance of preventing AML/CTF.
 - Maintaining appropriate records.
 - Review of the management framework to ensure effectiveness and take account of any changes to legislation, potential threats.