

SKY LINKS CAPITAL LLC

Anti – Money Laundering Manual

Summary: PROCEDURE FOR COMPLIANCE WITH ANTI-MONEY LAUNDERING, COUNTER – TERRORIST FINANCING AND SANCTIONS REGULATIONS IN THE UNITED ARAB EMIRATES

(UNDER LICENSE UNDER CATEGORY 5)

The information contained in this document is property of Sky Links Capital L.L.C. Any disclosure, reproduction or transmission to unauthorized persons without the prior written permission of Sky Links Capital L.L.C. is prohibited.

*This document is a high-level summary of Sky Links Capital's AML/CTF/CPF policies and controls. It is intended for general informational purposes for clients and partners. It does not contain full internal procedures or all details of our compliance program, and it should not be construed as legal or regulatory advice. **For further information or specific inquiries regarding our compliance framework, please contact our Compliance Officer.** Sky Links Capital remains committed to continuous improvement of its AML/CTF measures in line with evolving regulations and best practices.*

Office#208, BB03, Bay Square, Business Bay, Dubai, UAE. **Dubai Economic Department** Registration No:
1385407

Sky Links Capital L.L.C is licensed and regulated by the **Securities and Commodities Authority (SCA)**, UAE as on
Introductory to Financial Services entity. The firm does not provide investment advice, hold client funds, or
execute traders on behalf of clients

Sky Links Capital LLC – AML/CTF/CPF Policy Summary

Sky Links Capital L.L.C. (the “Firm”) is committed to the highest standards of Anti-Money Laundering, Countering the Financing of Terrorism, and Counter Proliferation Financing (AML/CTF/CPF). As a UAE Securities and Commodities Authority (SCA) licensed firm (Category 5 – **Introducer**) (license number 20200000235), having its registered address at Office 208, BB03, Bay square, Business Bay, Dubai, United Arab Emirates, Sky Links Capital complies fully with all applicable UAE laws and regulations, including **Federal Decree-Law No. 20 of 2018** (the UAE AML/CFT Law) and its Executive Regulations in **Cabinet Decision No. 10 of 2019**, as well as SCA’s own rulebook (**SCA Decision No. 13/R.M of 2021**). The Firm’s policies are also aligned with international standards set by the **Financial Action Task Force (FATF)** and guidance from UAE authorities (such as the National Anti-Money Laundering Committee and the UAE **Executive Office of AML/CFT**). Below is a high-level summary of our AML/CTF/CPF framework, suitable for clients, partners, and regulators, covering key elements of our compliance program.

Risk-Based Approach (RBA)

Sky Links Capital adopts a **risk-based approach** to AML/CTF/CPF compliance, meaning our efforts and controls are proportionate to the risks identified in our business. This approach is both a regulatory requirement and a practical strategy: UAE regulators mandate a risk-based framework, requiring entities to tailor measures to their risk profile, business nature, and size. In practice, the Firm performs periodic **Business Risk Assessments** to evaluate the money laundering and terrorism financing risks inherent in our operations. At least annually – and more frequently if there are material changes – we assess factors such as the types of customers we serve, the **geographic areas** we operate in, the nature of our **products and services**, our delivery and distribution channels, and the complexity and volume of transactions we facilitate. New products, business practices, or technologies are also reviewed for potential financial crime risks before launch. All risk assessments are **documented, updated regularly, and approved by senior management**, ensuring that our AML controls remain objective, proportional to identified risks, and up-to-date. In line with **FATF** guidelines and UAE law, this risk-based approach allows us to focus greater resources on higher-risk areas while maintaining efficient controls for lower-risk activities.

Customer Risk Profiling and Scoring

A cornerstone of our AML program is robust **Customer Due Diligence (CDD)** with risk-based **customer profiling**. For every new client, Sky Links Capital conducts a detailed **Customer Risk Assessment** to assign a risk rating (typically **Low**, **Medium**, or **High**) reflecting that customer’s potential money laundering/terrorism financing risk. This risk scoring considers multiple factors – including the customer’s identity and background, country of origin or residence, business or occupation, expected account activity, and any other relevant risk indicators. Based on the assessed risk level, we tailor our due diligence intensity and ongoing monitoring frequency. For example, a **Low-risk** customer may undergo simplified due diligence and have their profile reviewed periodically (at least every 3 years), whereas a **High-risk** customer will be subjected to enhanced checks and more frequent review (at least annually). The Firm’s internal procedures define these review cycles (e.g. Medium-risk profiles are reviewed at least every 2 years). All customers are screened against sanctions and watch-lists at the onboarding stage (and regularly thereafter), and their information (including beneficial owners and controllers) is verified using reliable independent sources. We also **periodically revisit each customer’s risk rating** to ensure it remains accurate in light of any new information or changes in the customer’s behavior or external risk environment. If a customer’s risk profile changes (for instance, due to an unusual transaction or a negative news hit), we

Office#208, BB03, Bay Square, Business Bay, Dubai, UAE. **Dubai Economic Department** Registration No:
1385407

Sky Links Capital L.L.C is licensed and regulated by the **Securities and Commodities Authority (SCA)**, UAE as on
Introductory to Financial Services entity. The firm does not provide investment advice, hold client funds, or
execute traders on behalf of clients

update the risk score and adjust our due diligence measures accordingly. By quantitatively scoring customer risk and coupling it with defined due diligence standards, Sky Links Capital ensures consistent and effective identification of higher-risk relationships.

Enhanced Due Diligence (EDD)

For customers or situations that are classified as **High Risk**, Sky Links Capital applies **Enhanced Due Diligence (EDD)** measures, above and beyond standard KYC requirements. High-risk scenarios generally include customers rated High in our risk scoring system, as well as specific risk factors mandated by law – for example, accounts involving **Politically Exposed Persons (PEPs)**, clients from **high-risk jurisdictions**, complex corporate structures, or any case that exhibits unusual or suspicious characteristics. In such cases, the Firm performs deeper scrutiny to mitigate the elevated risks. **EDD measures** may include: obtaining additional identification documents and information on the customer's nature of business and the intended purpose of the account or transaction; **verifying the source of the customer's funds and wealth** more extensively; requiring **senior management approval** before onboarding or continuing a high-risk relationship; and implementing more frequent or detailed ongoing monitoring of that client's transactions. For example, if we were to onboard a PEP or a client from a country with strategic AML/CFT deficiencies, we would ensure that appropriate senior personnel review and approve the relationship, and that we have documented the origin of the client's funds. We also **enhance the frequency of account reviews** (conducting reviews at least annually, or more often if warranted) and increase scrutiny on that client's transaction patterns. These steps align with regulatory expectations under UAE law and FATF standards that call for enhanced due diligence whenever higher risks are identified. The SCA and UAE Central Bank may also issue directives or circulars requiring specific EDD measures for certain jurisdictions or emerging risks, and Sky Links Capital incorporates such guidance promptly. Through EDD, the Firm seeks reasonable assurance that high-risk clients are not abusing our services for illicit purposes, and any red flags are addressed proactively.

Ongoing Monitoring and Reporting

Implementing an effective AML/CTF program is not a one-time event at onboarding – it requires continuous vigilance. Sky Links Capital has established robust **ongoing monitoring** processes to detect and respond to suspicious activities throughout the life of the customer relationship. All client transactions and account activities are monitored (through both automated systems and manual oversight) to ensure they are consistent with the customer's known profile, risk rating, and stated purpose of account. We pay particular attention to **unusual or high-risk patterns**, such as complex or unusually large transactions, abrupt changes in transaction volume or direction, or activity that has no clear economic or lawful purpose. Certain **trigger events** will prompt an immediate review of the customer's profile – for example, if a client undertakes a transaction that is significantly above their normal range, if we receive a sanctions alert or negative news about the client, or if the client's business circumstances change materially. In such cases, we may perform refreshed due diligence and, if necessary, re-classify the customer's risk level (which could lead to enhanced measures as described above).

In line with **UAE Federal AML law** requirements, Sky Links Capital also maintains strict procedures for **Suspicious Transaction Reports (STRs)**. All employees are trained to escalate any knowledge or suspicion of money laundering, terrorist financing, or proliferation financing to our **Compliance Officer/MLRO** without delay. The MLRO will investigate the matter and, if suspicion is confirmed, file an STR with the UAE **Financial Intelligence Unit (FIU)** (via the official goAML portal) in accordance with the law. We emphasize our staff's legal obligation to report and the prohibition against "tipping off" (i.e., informing the client or any outside party that a suspicion has been reported) – failure to report or incidents of tipping-off carry serious legal consequences under Federal Decree-Law 20 of 2018. The Firm's policy

Office#208, BB03, Bay Square, Business Bay, Dubai, UAE. **Dubai Economic Department** Registration No:
1385407

Sky Links Capital L.L.C is licensed and regulated by the **Securities and Commodities Authority (SCA)**, UAE as on
Introductory to Financial Services entity. The firm does not provide investment advice, hold client funds, or
execute traders on behalf of clients

is to err on the side of caution and report suspicious activities promptly, while ensuring such reports remain confidential as required. Additionally, **periodic AML compliance reports** are provided to senior management. In fact, under **Cabinet Decision 10 of 2019** and the AML law, Sky Links Capital submits **semi-annual AML reports** to our Board and to the SCA, summarizing our risk assessment updates, compliance program effectiveness, and any material compliance issues or developments. By closely monitoring customer activity and having clear internal escalation protocols, we strive to promptly identify and report any behavior that might indicate money laundering or terrorism financing.

Sanctions and Proliferation Financing Controls

Sky Links Capital fully complies with all **Targeted Financial Sanctions** obligations in the UAE, including United Nations Security Council sanctions and the UAE's own **local terrorism lists** aimed at combating terrorist financing and proliferation of weapons of mass destruction. We have implemented a comprehensive **sanctions screening** system: all new clients, as well as beneficial owners and related parties, are screened against the latest lists (UN Security Council consolidated list, UAE Local Terrorist List, and other relevant international sanctions lists) before onboarding, and on an ongoing daily basis thereafter. In accordance with **Cabinet Decision No. 20 of 2019** and **Cabinet Decision No. 74 of 2020**, which implement UN sanctions and domestic terrorist designations in the UAE, the Firm ensures that no business is conducted with any person or entity that is subject to sanctions. If a potential or existing customer is found to be a **designated person**, or owned/controlled by a designated person, we will immediately take the legally required actions: this includes freezing any assets or funds in their accounts **without delay** and refraining from executing any transactions, as well as promptly notifying the relevant authorities (such as the UAE Central Bank and Centre of FIU) of the freeze and related details.

The Firm stays updated on sanctions developments through official channels. The UAE's **Executive Office for AML/CTF** (sometimes referred to as the Executive Office of the Committee for Goods and Material Subject to Import and Export Control, or EOCN) is the central authority coordinating sanctions implementation and proliferation financing controls in the UAE. We closely follow all **Executive Office directives** – for instance, any circulars communicating additions or removals of names on the UN or local sanctions list are acted upon immediately within our screening systems. Our staff receive specific training on sanctions compliance, including recognizing potential red flags for sanctions evasion or proliferation financing (such as dealings with certain high-risk jurisdictions, unusual trade finance transactions, dual-use goods concerns, etc.). By integrating these measures, Sky Links Capital ensures full alignment with UAE sanctions laws and UN Security Council Resolutions, effectively contributing to the prevention of terrorist financing and the enforcement of non-proliferation controls.

Alignment with UAE National Risk Assessment (NRA)

Sky Links Capital recognizes the importance of the **UAE National Risk Assessment (NRA)** in informing our AML/CTF strategy. The UAE government has conducted comprehensive national risk assessments to identify the primary money laundering and terrorist financing threats facing the country, and has developed a **National AML/CTF Strategy (2020–2023)** to address those risks. Our Firm stays abreast of these national findings and strategically aligns its internal policies and controls to support the broader risk mitigation efforts. For example, if the NRA (or related guidance from the National Anti-Money Laundering Committee) indicates heightened risks in certain areas – such as risks associated with particular customer sectors, products, or geographic corridors – we factor those into our own Business Risk Assessment and customer risk scoring model. This ensures that our risk categorization and controls are not developed in isolation, but rather are calibrated to the **wider risk environment of the UAE**. In practice, when performing our periodic risk assessment, we explicitly **consider the results of the UAE NRA**, as required by regulators. UAE authorities expect financial institutions to

Office#208, BB03, Bay Square, Business Bay, Dubai, UAE. **Dubai Economic Department** Registration No:
1385407

Sky Links Capital L.L.C is licensed and regulated by the **Securities and Commodities Authority (SCA)**, UAE as on
Introductory to Financial Services entity. The firm does not provide investment advice, hold client funds, or
execute traders on behalf of clients

demonstrate awareness of national risk conclusions; indeed, regulatory questionnaires and audits will check that an institution's risk framework has taken into account the NRA's conclusions. By mirroring national priorities (for instance, focusing on areas like trade-based money laundering, virtual asset risks, or abuse of corporate structures if these are flagged nationally), Sky Links Capital not only remains compliant but contributes to the overall effectiveness of the UAE's fight against financial crime. This alignment underscores our commitment to be an active partner in the UAE's **collective effort** – as evidenced by the country's ongoing enhancements to its AML/CFT regime and successful removal from the FATF "grey list" through demonstrated improvements.

Disclaimer

*This document is a high-level summary of Sky Links Capital's AML/CTF/CPF policies and controls. It is intended for general informational purposes for clients and partners. It does not contain full internal procedures or all details of our compliance program, and it should not be construed as legal or regulatory advice. **For further information or specific inquiries regarding our compliance framework, please contact our Compliance Officer.** Sky Links Capital remains committed to continuous improvement of its AML/CTF measures in line with evolving regulations and best practices.*

DANIEL TAKI EDDINE	Head of Category at Sky Links Capital LLC	daniel.t@skylinkscapital.com + 971-04-495-7001
Muhammad Abbas Yousaf	Head of Compliance	compliance@skylinkscapital.com + 971-04-495-7009

Office#208, BB03, Bay Square, Business Bay, Dubai, UAE. **Dubai Economic Department** Registration No:
1385407

Sky Links Capital L.L.C is licensed and regulated by the **Securities and Commodities Authority (SCA)**, UAE as on
Introductory to Financial Services entity. The firm does not provide investment advice, hold client funds, or
execute traders on behalf of clients