

### **B2B PRIME SERVICES MENA LIMITED**

### **AML & CTF STATEMENT**

#### 1. INTRODUCTION

**B2B Prime Services MENA Limited** (the "Company") is incorporated in the Dubai International Financial Centre (DIFC) and is authorized and regulated by the Dubai Financial Services Authority (DFSA) under license F009446. The Company maintains a zero-tolerance policy towards money laundering (AML), terrorist financing (CTF) and proliferation financing (CPF). Our compliance framework aligns with the DFSA AML Rulebook (AML Module) and the UAE Federal AML/CTF/CPF legislation, including Federal Decree-Law No. 20 of 2018.

#### 2. RISK BASE APPROACH

The Company applies a Business-wide Risk Assessment and Customer Risk Assessment to identify, mitigate and monitor ML/TF/CPF risks, implementing controls proportionate to the level of risk. The Company also maintains a Client Acceptance Policy prohibiting high-risk or non-compliant relationships.

## 3. CUSTOMER DUE DILIGENCE (CDD) AND MONITORING

We conduct Customer Due Diligence (CDD) for all clients, Enhanced Due Diligence (EDD) for Politically Exposed Persons (PEPs) and other high-risk relationships, and Simplified Due Diligence (SDD) where appropriate. All relationships are subject to ongoing monitoring, tailored to the customer's risk profile and transaction patterns.

## 4. SANCTIONS AND COUNTER-PROLIFERATION FINANCING (CPF)

The Company performs sanctions screening against national and international lists and complies with Targeted Financial Sanctions and Counter-Proliferation Financing obligations, including freezing and reporting measures where required.

### 5. DETECTION AND REPORTING

We maintain transaction monitoring systems and internal channels for escalating alerts to the MLRO. Where appropriate, Suspicious Transaction Reports (STRs) or Suspicious Activity Reports (SARs) are filed with the UAE FIU and the DFSA is notified immediately thereafter.

### 6. GOVERNANCE AND TRAINING

The Board of Directors and Senior Management oversee the AML framework. The MLRO is responsible for day-to-day implementation and regulatory reporting. The Company provides periodic AML/CTF/CPF training to all relevant staff and subjects its framework to independent review and testing.



# 7. RECORD KEEPING AND DATA PROTECTION

All AML records are retained in line with DFSA/DIFC requirements, normally for a minimum of six (6) years after the end of the business relationship. The processing of personal data for AML purposes is conducted in compliance with the DIFC Data Protection Law and the Company's Privacy Policy.

# 8. CONTACT

For confidential AML/CTF/CPF-related queries or reports, please contact: mlro@b2prime.com