



Osool Capital AML Policy & Procedure

Vision:

- will lead the Trading Worldwide landscape through enhancing its ability to a very excellent management decision making extend.

Mission:

- AML will assist management in making decisions through the systematic identification, assessment, treatment, monitoring and reporting and defining risks that would hinder the achievement of 's objectives easily.

Objectives:

- Promote decision making during business planning, strategy implementation, and when exploring investment opportunities.
- Develop and capitalize on the organization's understanding of its risk to leverage opportunities and develop a unique competitive advantage so that may become the leading player in the Trading Worldwide landscape markets.
- Establish effective and transparent communication and reporting lines, ensuring that information relating to key risks is provided to decision-makers in a timely manner, so that the interests of may be protected through more informed decision-making.
- Safeguard 's assets including human capital, minimize financial loss, ensure continued operations, and mitigate the negative effects that disruptions can have on strategic plans, reputation, operations, market position while ensuring compliance with applicable laws and regulations.
- Build a strong infrastructure utilizing the commonly accepted Compliance standard to facilitate effective functioning of the Group Compliance processes.

1. Philosophy

The sustainable and effective implementation of Compliance becomes the active responsibility of 's Board of Directors, Executive Team and all employees.

All 's staff is required to have, an in depth understanding, robust ownership and resilient commitment to the management of foreseeable risks that may conflict with 's values of



delivering unparalleled products/experience and the development of respectful and durable relationship with its customers.

The Compliance Function shall strive to support in the achievement of its strategic objectives and ensuring the organization successfully contributes to the aims of all stakeholder

AML Role and Responsibility:

AML Function Role	Roles & Responsibilities
Compliance AML Director	<ul style="list-style-type: none"> • Develop and communicate. • Establish AML Strategy and coordinate/facilitate the process for developing risk appetite, defining risk tolerance and designing KRIs. • Design the AML entity-wide risk profile • Monitor all risk management activities across the Group, and ensure a risk-management process is effectively implemented in the company. • Provide AML training to all champions as well as other employees (if needed) related to risk management activities. • Review departmental risk register and compilation of the corporate risk register. • Suggest mitigating actions or assign risk treatment owners if needed. • Monitor and evaluate the effectiveness of risk treatment strategies and controls. • Facilitate other departments in risk management techniques for business processes. • Develop periodic AML reports for the CEO & The Board.

1. AML Delegation of Authority

The following matrix depicts the AML authority matrix for the Framework as follows:

Particulars	Frequency	BoD	CEO	Director AML
AML Training	Annually	I	A2	R
AML Structure review & update	Annually	I	A2	A1
AML Matrix review & update	Annually	I	A2	A1
Risk profile and mitigation actions – development and monitoring	Quarterly	I	A2	A1
Departmental AML Registers	Quarterly	I	A2	A1
Corporate Compliance Registers	Quarterly	I	A2	A1
Internal and External AML Reports	Quarterly	I	A2	A1

LEGEND			
BoD	Board of Directors	I	Informed
CEO	Chief Executive Officer	A2	Approval 2
Compliance & AML Director	Compliance & Risk Management Champion	R, A1	Reviewer, Approval 1

2. AML Escalation Matrix

The Compliance Escalation Matrix defines the person that is responsible to take forth escalations, in case of delayed action towards completion of treatment plans. Responsible individuals are required

to follow up with relevant Risk Champions and applicable parties to ensure that treatment plans are completed accordingly. Please refer to the table below for further detail as follows:

	Delays up to 1 Month from Due Date	Delays between 1 Month and 1 Quarter from Due Date	Delays over 1 Quarter from Due Date
Low	AML Director	CEO	Board Of Directors
Moderate	AML Director	CEO	Board Of Directors
High	AML Director	CEO	Board Of Directors

3. AML Culture

- 3.1. In order to apply AML effectively, it is vital that AML culture to be developed. The AML culture supports the overall vision, mission, and objectives of . Limits and boundaries should be established and communicated concerning what are acceptable risk practices and outcomes.
- 3.2. In order to promote AML awareness and spread this culture across the organization, the AML conducts periodic risk awareness activities which are in one or a combination of the following forms:
 - Induction to new joiners
 - AML Trainings.
 - Online Training.

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A. Definitions

Term of Abbreviation	Definition
Group	and its subsidiaries, affiliates and joint ventures
Board/ BOD	Board of Directors of the Company
BU/ Business Unit	A Division of the Company with a business/ commercial function
Company	and its Subsidiaries
Department	An Organizational unit of the Company, which forms part of a division. A Department falls under the leadership of a head position or higher, who reports directly to the Executive Manager of the Division.
DoA	A Delegation of Authority is a binding document that assigns the responsibility or authority to conduct specific activities from one person to another.
Employee	An employee of the Company, which includes temporary, permanent, full-time, and part-time employees.
Function	An operational area within a department, as set out in its organizational chart.
Policy	An Instrument containing statements of principle, business rules, or general processes that articulate or align with legal, regulatory, or organizational requirements, and by which the Company is guided in the management of its affairs and the development of Procedures.

Process	Process is a series of tasks to be undertaken to carry out operational tasks, eventually achieve the intended results or outputs, and contribute to the successful operation of the Company. The process also identifies specific responsibilities and supporting documents necessary for its full implementation and maintenance.
Process Owner	The Division/ Department with responsibility for their policies, activities, functions, and processes which are the subject to the Instrument. Where more than one Division/ Department share responsibility for the policies, activities, functions, and processes, the one with primary responsibility is the Process Owner and the others are stakeholders.
Subsidiaries	Entities, including unincorporated entities such as a partnership, which are owned or controlled by the Company.
Supporting Documents	Non-binding documents which support the implementation of Instruments. cannot be used to impose binding, mandatory obligations. Supporting Documents include but are not limited to guidelines, forms, templates, SOPs, and any 'uncontrolled' documents (E.g., system generated or external).