

# AML/CFT Policy Summary

Ram Fintech s.r.o. · Draft for EMI licensing

AML/CTF Policy Statement (Summary)

Company: Ram Fintech s.r.o. Version: 1.0 (Public Disclosure)

Date: [Enter date]

Regulatory framework: Act No. 253/2008 Coll. (AML Act)

## 1. Commitment to Compliance

Ram Fintech s.r.o. (hereinafter referred to as the “Company”) is committed to the highest standards in the areas of anti-money laundering (AML) and counter-terrorism financing (CTF). As an applicant for an electronic money institution (EMI) license under the supervision of the Czech National Bank, the Company implements internal procedures designed to prevent the misuse of its financial services for illegal purposes.

## 2. Legal Framework

Our policy is fully in line with:

Act No. 253/2008 Coll., on Certain Measures Against Money Laundering and the Financing of Terrorism (AML Act).

The FATF's international standards and the relevant EU directives (the 4th and 5th AML Directives).

Implementing decrees of the Czech National Bank.

## 3. Key Elements of an AML Program

### 3.1. Customer Identification and Verification (KYC/KYB)

Before entering into any business relationship, the Company conducts a thorough customer identification process. This process includes:

Verification of the identity of individuals and representatives of legal entities using valid identification documents.

Identification and verification of the ultimate beneficial owner (UBO) for corporate clients.

Assessment of the purpose and intended nature of the business relationship.

### 3.2. Monitoring Sanctions Lists and PEPs

All entities are screened against international and national sanctions lists (including OFAC, EU, and UN sanctions lists). The company also identifies politically exposed persons (PEPs), who are subject to enhanced due diligence (EDD).

### 3.3. Transaction Monitoring

The Company uses automated monitoring systems to detect unusual or suspicious transactions in real time. If a suspicious transaction is detected, the Company is required to file a report with the Financial

Analytical Office (FAÚ).

#### 4. Logistical Arrangements

Responsibility for the implementation and compliance with the AML program rests with the designated AML Officer (Alena Bulachová). The Compliance Department conducts regular risk assessments and provides AML/CTF training to all employees.

#### 5. Data Retention

In accordance with legal requirements, the Company retains all identification data and transaction documentation for a period of 10 years from the termination of the business relationship or the completion of the transaction.

#### 6. Cooperation with authorities

The company fully cooperates with the Czech National Bank, the Financial Analytical Office (FAÚ), and law enforcement authorities in providing information necessary for the fight against financial crime.

Ram Fintech s.r.o. Compliance & AML Department

Contact: [compliance@ram-fintech.com]