



Institutional Policy

counter-terrorism financing and money laundering policy

2023

# **Policy**

SenzAgro (Pvt) Ltd is committed to preventing and detecting money laundering and other forms of financial crime. This policy sets out SenzAgro's procedures for complying with relevant laws and regulations, and for ensuring that its staff are aware of their responsibilities in this area.

### Scope

This policy applies to all staff of SenzAgro, regardless of their role or location. It also applies to all third-party service providers who work on behalf of SenzAgro.

#### **Definitions**

- Money laundering: Money laundering is the process of concealing the origins
  of illegally obtained money. It is often used to finance terrorism and other
  criminal activities.
- Counter-terrorism financing: Counter-terrorism financing is the process of preventing and detecting the financing of terrorism.
- Financial crime: Financial crime is any criminal activity that involves the use of financial services. This can include money laundering, terrorist financing, fraud, and corruption.

### Responsibilities

All staff have a responsibility to comply with this policy. This includes:

- Understanding SenzAgro's procedures for preventing and detecting money
   laundering and other forms of financial crime.
- Reporting any suspicions of money laundering or other financial crime to SenzAgro's compliance officer.
- Cooperating with SenzAgro's investigations into suspected money laundering or other financial crimes.

#### **Procedures**

SenzAgro has a number of procedures in place to prevent and detect money laundering and other forms of financial crime. These include:

- Customer due diligence: SenzAgro conducts customer due diligence on all new customers. This involves collecting information about the customer's identity, source of funds and intended use of SenzAgro's services.
- Monitoring transactions: SenzAgro monitors all transactions for signs of money laundering or other financial crimes. This includes looking for unusual or suspicious transactions.
- Reporting suspicious activity: SenzAgro has a reporting procedure for suspicious activity. This procedure allows staff to report any suspicions of money laundering or other financial crimes to SenzAgro's compliance officer.

# **Training**

SenzAgro provides training to all staff on SenzAgro's policies and procedures for preventing and detecting money laundering and other forms of financial crime. This training covers the following topics:

- The definition of money laundering and other forms of financial crime.
- SenzAgro's procedures for preventing and detecting money laundering and other forms of financial crime.
- The importance of reporting suspicious activity.

#### **Enforcement**

SenzAgro takes a zero-tolerance approach to money laundering and other forms of financial crime. Any staff member who is found to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

#### Review

This policy will be reviewed on a regular basis to ensure that it remains effective.



SenzAgro Private Limited

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