SANDJAR GROUP

ATLAS PLATFORM

DOCUMENT No. 4

AML / KYC Policy of ATLAS Platform

Anti-Money Laundering, Counter-Terrorism Financing & Know Your Customer Framework

Issued by:	Atlas Overseas FZE
Document Version:	v1.0 — May 2026
Jurisdiction:	UAE Federal | FATF International Standards
Regulatory Basis:	UAE Federal Decree-Law No. 20 of 2018; Cabinet Decision No. 10 of 2019
Classification:	Confidential & Proprietary — Regulatory Document

I. POLICY STATEMENT & LEGAL BASIS

Atlas Overseas FZE (the 'Platform') is committed to the highest standards of Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) compliance. The Platform operates zero tolerance for money laundering, terrorism financing, sanctions evasion, and all related financial crimes. This Policy applies to all users, transactions, agents, developers, and employees interacting with the ATLAS Platform.

1.1 Governing Legal Framework

Law / Standard	Application to ATLAS
UAE Federal Decree-Law No. 20 of 2018 (AML/CFT)	Primary AML/CTF legislation. Defines money laundering, terrorism financing, and obligated entity requirements.
Cabinet Decision No. 10 of 2019	Implementing regulation for AML law. Defines CDD, EDD, STR obligations, and record-keeping requirements.
CBUAE AML/CFT Guidelines (2021)	Sector-specific guidance for financial institutions and designated non-financial businesses including real estate.
DLD / RERA AML Guidelines	Real estate-specific AML obligations for property transactions above AED 55,000 threshold.
FATF 40 Recommendations	International standard — Platform aligns its risk-based approach to FATF methodology.
UN Security Council Sanctions Lists	Mandatory screening against UN consolidated sanctions list for all parties.
EU / OFAC / HM Treasury Sanctions	Cross-jurisdictional sanctions screening for all international transactions and non-UAE clients.
UAE Cabinet Decision No. 74 of 2020 (Beneficial Ownership)	Beneficial ownership transparency requirements for corporate clients and legal entities.

II. CUSTOMER DUE DILIGENCE (CDD) — KYC FRAMEWORK

2.1 CDD — Standard Requirements (All Users)

All Platform users must complete Standard CDD before any account is activated or any transaction is executed. No exceptions are permitted regardless of referral source, user type, or transaction size.

CDD Element	Natural Person	Legal Entity / Corporate
Identity Document	Passport or Emirates ID (current, not expired)	Certificate of Incorporation + Memorandum of Articles
Proof of Address	Utility bill / bank statement (< 3 months)	Registered office address + proof of business address
Biometric Verification	Face ID liveness check (platform-native)	Authorised signatory Face ID + board resolution
Beneficial Ownership	N/A for individuals	UBO declaration: all persons with >25% ownership or control
Source of Funds	Declaration for transactions > AED 55,000	Source of funds declaration + audited financials / bank statements
Sanctions Screening	OFAC / UN / EU / HM Treasury — automated real-time	Same + enhanced FATF high-risk country screening
PEP Check	Politically Exposed Person check — automated	PEP check on all directors, UBOs, and signatories

2.2 Enhanced Due Diligence (EDD) — Trigger Conditions

Enhanced Due Diligence is mandatory in the following circumstances. EDD requires senior management approval and extended document collection before the transaction may proceed.

- Politically Exposed Persons (PEPs) — current or former heads of state, senior government officials, senior judiciary, military officers, and their immediate family members.
- Transactions above AED 500,000 (USD 136,000) equivalent from any single client within a 30-day period.
- Clients or counterparties from FATF high-risk and monitored jurisdictions (current FATF grey/black list).
- Non-face-to-face account opening with clients outside the UAE.
- Complex or unusually structured transactions with no apparent economic rationale.
- Corporate clients with opaque ownership structures, nominee directors, or bearer shares.
- Clients who have previously triggered an STR flag on any previous interaction.
- Crypto-funded transactions above USD 10,000 equivalent — blockchain analytics screening (Chainalysis / Elliptic) mandatory.

III. TRANSACTION MONITORING & SUSPICIOUS ACTIVITY

3.1 Real-Time Monitoring Controls

Monitoring Control	Specification
Velocity Monitoring	AI-driven analysis of transaction frequency and volume per user. Alerts triggered on unusual spikes (>3x 30-day average within 72 hours).
Structuring Detection	Automated detection of transactions structured to avoid AED 55,000 reporting threshold (e.g., multiple transactions of AED 50,000 within 7 days).
Geographic Risk Scoring	Each transaction is geo-risk scored based on counterparty location, payment origin country, and IP geolocation. High-risk score triggers manual review.
Crypto Wallet Screening	All cryptocurrency wallet addresses processed through blockchain analytics before funds are accepted. Wallets with >15% exposure to darknet markets, mixing services, or sanctioned entities are rejected.
Beneficial Ownership Consistency	Ongoing monitoring of declared beneficial ownership vs. transactional behaviour. Changes in ownership pattern during active transactions trigger re-verification.
Document Authenticity	AI-assisted document verification detects altered IDs, manipulated bank statements, and counterfeit title deeds. Human review required for all flagged documents.

3.2 Suspicious Transaction Report (STR) Procedure

Detection	Automated system or platform staff identifies a transaction or behaviour matching STR indicators.
Internal Review	Compliance Officer reviews flagged transaction within 2 business hours. Transaction is placed under administrative hold (no funds released).
Decision	If STR confirmed: report filed with CBUAE Financial Intelligence Unit (FIU) via goAML platform within 24 hours. If cleared: administrative hold lifted; transaction resumes.
Client Notification — PROHIBITED	The Platform is legally prohibited from notifying the client that an STR has been filed ('tipping-off' prohibition — UAE AML Law, Article 17). No communication to the client regarding the STR is permitted.
Record Retention	STR file and all supporting evidence retained for minimum 5 years from filing date.
Transaction Freeze	If STR is escalated to formal investigation, all ATLAS funds associated with the flagged client are frozen pending UAE Public Prosecution / CBUAE instruction.

IV. RECORD KEEPING, TRAINING & GOVERNANCE

4.1 Record Keeping Requirements

- All KYC documents retained for minimum 5 years from end of business relationship (UAE AML Law requirement).
- All transaction records retained for minimum 5 years from transaction date.
- STR records and supporting evidence retained for minimum 5 years from filing date.
- All records maintained in encrypted digital format with access control — retrievable within 48 hours upon regulatory request.
- Blockchain transaction records are permanently immutable — no deletion possible.
- Document storage compliant with UAE PDPL (Federal Law No. 45 of 2021 on Personal Data Protection).

4.2 AML Governance Structure

Role	Responsibilities
Money Laundering Reporting Officer (MLRO)	Designated senior officer responsible for STR filing, regulatory liaison, and AML programme oversight. Appointed per CBUAE requirements.
Compliance Officer	Day-to-day administration of KYC processes, EDD reviews, transaction monitoring alerts, and staff training programme.
Board / Senior Management	Annual AML programme review and approval; resource allocation; tone-from-the-top culture of compliance.
All Platform Staff	Mandatory AML training (minimum 8 hours per year); obligation to report suspicions to MLRO; zero tolerance for facilitation of financial crime.
External Auditor	Annual independent AML audit; review of controls effectiveness; recommendations to Board.

Disclaimer: This AML/KYC Policy is reviewed and updated annually or upon material regulatory change. Atlas Overseas FZE reserves the right to refuse any transaction, terminate any account, and report any suspicious activity without prior notice to the client, in full accordance with UAE law.

