

Anti-Money Laundering, Counter-Terrorism Financing, and Concealment of Assets,  
Rights, and Values Prevention and Combat Policy



**Version No. 1.1**  
**Date: 2025/05**



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## 1. OBJECTIVE

This policy aims to define the guidelines, rules, and procedures to be observed by any entity related to **OASIS INTERNATIONAL SOLUTIONS FZCO**, with the objective of ensuring operational compliance with legal and regulatory requirements as well as international best practices related to Money Laundering crimes, concealment of assets, rights, and values, and Terrorism Financing.

## 2. DEFINITIONS

- **AML:** Anti-Money Laundering.
- **Registration:** Repository of data and documents provided by clients and validated by the Compliance sector of **OASIS INTERNATIONAL SOLUTIONS FZCO**.
- **Client:** An individual or corporate entity utilizing the services offered by **OASIS INTERNATIONAL SOLUTIONS FZCO**, subject to document approval.
- **FACB:** Financial Activities Control Council.
- **Placement:** Introduction of proceeds derived from antecedent crimes into the financial system through deposits or acquisition of negotiable instruments offered by financial institutions.
- **Structuring:** A method where multiple individuals conduct illegal funds through multiple transactions at one or more financial institutions by dividing funds into amounts below the reporting thresholds mandated by government agencies.
- **Integration:** The reintroduction of illicit money to criminals with a legitimate appearance, typically by incorporating the funds into the economic system through luxury asset purchases or financial, commercial, and industrial investments.
- **KYC:** "Know Your Customer."
- **Money laundering:** Economic-financial practices designed to conceal or obscure the illicit origin of financial assets or patrimonial goods, making them appear legitimate or challenging the demonstration or proof of their unlawful origin.
- **Concealment:** Repeatedly transferring illicitly obtained funds to obscure their traceability, complicating investigations into their origin and enhancing anonymity.

## 3. EFFECTIVENESS

This Policy shall be periodically reviewed and approved by **OASIS INTERNATIONAL SOLUTIONS FZCO's** management, annually or within shorter intervals as required in the case of changes in applicable legislation or adjustments to the company's business practices or corporate events deemed necessary by the Board. Once approved by the Board of Directors, this Policy will be widely disseminated internally and made available on its website. The manual will also be provided to any entity in contact with **OASIS INTERNATIONAL SOLUTIONS FZCO's** Compliance sector.

## 4. GENERAL PROVISIONS

The challenge of identifying and suppressing increasingly sophisticated operations aimed at obscuring the origin, ownership, and movement of assets and values derived from illegal activities is critical. All employees, independent investment agents, and service providers are responsible for understanding and adhering to the terms of this Policy to prevent and detect atypical operations or transactions to combat Money Laundering, concealment of assets, rights, and values, and Terrorism Financing crimes. The laws and regulations related to these offenses, along with the rules and guidelines of this Policy, must be strictly followed.



**OASIS INTERNATIONAL SOLUTIONS FZCO** must continuously evaluate the risks of misuse of its products and services for Financing Terrorism, Money Laundering, or concealment of assets, rights, and values and take necessary measures to mitigate such risks.

This Policy will outline the concepts of Money Laundering, Terrorism Financing, the stages constituting the crime, and the characteristics of individuals and products susceptible to involvement in such crimes. It reinforces the organizational structure's commitment to combating Money Laundering and Terrorism Financing. Furthermore, the Policy lists examples of activities and operations indicative of Money Laundering, defines rules for KYC form application and investigation, and specifies that any evidence of Money Laundering or Terrorism Financing must be reported to **OASIS INTERNATIONAL SOLUTIONS FZCO's** management and Compliance area for verification and regulatory reporting when applicable.

By approving this Policy, **OASIS INTERNATIONAL SOLUTIONS FZCO** commits to developing and maintaining effective processes and controls to prevent, detect, and combat Terrorism Financing, Money Laundering, and asset concealment, reflecting the best national and international practices for service providers with its characteristics.

## **5. STAGES OF MONEY LAUNDERING**

The Money Laundering process comprises three stages: placement, concealment, and integration. Placement involves introducing illicit funds into the economic system through deposits, negotiable instruments, or asset purchases. Concealment entails complex transactions to obscure the illicit source of funds, physically distancing the perpetrator from the funds. Integration incorporates illicit funds into the economic system, granting them a legitimate appearance.

## **6. RESPONSIBILITIES OF THE COMPLIANCE SECTOR**

Review and approve, annually (or more frequently as needed), the provisions, rules, principles, and guidelines applicable to Anti-Money Laundering and Terrorism Financing ("AML/CTF") matters involving **OASIS INTERNATIONAL SOLUTIONS FZCO**, as outlined in this document. Additionally, supervise, with the assistance of the Compliance department, the adherence to and compliance with the company's practices related to this document.

The Operations Director, Mr. Bruno Feijó Alves (Passport No.: GB715185), and the Compliance Officer, Mr. Gustavo Henrique Schneider Saft (Passport No.: YF110934), are responsible for the Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Program. They must comply with and enforce the established rules and procedures.



## **7. PROCEDURES**

As stipulated in this document, it is crucial for all employees and partners to recognize operations indicating Money Laundering or Terrorism Financing. Indicators of such crimes must be reported to Compliance and Management, which will ensure confidentiality, proper investigation, and reporting to competent authorities when necessary.

- **Situations where values are objectively incompatible with the professional occupation and the declared financial status.**
- **Transactions between the same parties or for the benefit of the same parties, in which there are repeated gains or losses related to any of the involved parties.**
- **Sudden evidence of significant fluctuation in the volume and/or frequency of transactions by any of the involved parties.**
- **Situations where there is a lack of information or situations that involve developments containing characteristics that could be used to conceal the identification of the actual involved parties and/or their beneficiaries.**
- **Situations whose characteristics and/or developments reveal repeated actions on behalf of third parties.**
- **Evidence of a sudden and unjustified change in the operational modalities typically used by the involved parties.**
- **Transactions designed to generate a loss or gain without any objective economic justification.**
- **Transactions involving individuals or entities from countries that do not apply or inadequately apply the recommendations of the Financial Action Task Force (FATF) against Money Laundering and Terrorist Financing.**
- **Private transfers of funds and securities without an apparent reason.**
- **Transactions where the beneficial owner cannot be identified.**
- **Transactions with a complexity and risk level incompatible with the technical qualifications of the client or their representative.**
- **Difficulties in providing the necessary information to open an account.**
- **Providing numerous bank accounts or changing them frequently.**
- **Transactions by the related entity that involve foreign exchange without considering the brokerage fees or exchange rates offered.**
- **The related entity conducts multiple foreign exchange transactions without apparent reason, especially if there has been little or no prior activity in the account.**
- **Authorizing a proxy without an apparent relationship.**
- **Resistance to providing information or providing incorrect information regarding identification or transactions details.**
- **Significant changes in the insured amount without an apparent cause.**
- **Change in the holder of a business or asset immediately before a claim.**
- **Payments made to beneficiaries with no apparent relationship to the insured, without justifiable reasons.**
- **Proposals or transactions that are incompatible with the socio-economic profile, financial capacity, or professional occupation of the client, beneficiary, third parties, or other related parties.**



When identified, suspected cases of Money Laundering and Terrorist Financing should be reported to Compliance and the Management of **OASIS INTERNATIONAL SOLUTIONS FZCO**, which will be responsible for maintaining confidentiality of the report and ensuring proper investigation, communicating with the relevant authorities when applicable.

Each report should be analyzed individually, and must include at least the following information to ensure proper justification:

- a) Date of commencement of the business relationship between **OASIS INTERNATIONAL SOLUTIONS FZCO** and the person involved in the case.
- b) Explanation of the situation, with a proper basis, regarding the warning signs observed.
- c) A detailed description of the transaction conducted.
- d) Presentation of the information obtained through the actions provided in this Policy, detailing the behavior of the person reported.
- e) Presentation of the final analysis, including a detailed report of the warning signs observed, and whether the situation is one that should be communicated to the Financial Activities Control Board (FACB), with the information outlined above.

If no reportable transactions or proposals occur within a year, **OASIS INTERNATIONAL SOLUTIONS FZCO** must submit an annual negative communication to FACB.

## **8. IDENTIFICATION AND HANDLING OF SIGNS OF MONEY LAUNDERING AND TERRORIST FINANCING**

**8.1. CLIENT IDENTIFICATION (KYC):** A set of actions that establish mechanisms for client data collection, under the responsibility of **OASIS INTERNATIONAL SOLUTIONS FZCO's** compliance area, for the electronic identification of clients, including the capture, updating, and storage of registration information. It also includes specific procedures for identifying ultimate beneficiaries and Politically Exposed Persons. **OASIS INTERNATIONAL SOLUTIONS FZCO** does not conduct business with anonymous entities. Relationships are prohibited with individuals or entities listed in financial sanctions lists from the United Nations (UN), US Office of Foreign Assets Control (OFAC), and the European Union, or any region considered a "high-risk financial jurisdiction."

No business relationships may be initiated or maintained without the completion of KYC procedures.

If clients are identified as high-risk, specific internal procedures may be adopted, requesting additional information and documentation.

The entire process will be formalized and archived for at least 10 years, available for regulatory authorities.



### **8.1.1. REGISTRATION OF INDIVIDUALS**

The information and documents required for electronic registration, for identification purposes, will include the following:

#### **Information:**

- a) Full Name
- b) ID number
- c) ID card
- d) Address
- e) Date of Birth
- f) Nationality
- g) Occupation
- h) Marital Status
- i) Mother's Name
- j) Email
- k) Phone/Cellphone
- l) Whether or not they are or have been a Politically Exposed Person
- m) Declared Wealth in IRPF (Income Tax)
- n) Available Net Worth

#### **Documents:**

- a) Copy of Identification Document
- b) Proof of Address
- c) Selfie with Document
- d) Income Tax Declaration
- e) Income Tax Declaration Receipt
- f) Other supplementary documents

### **8.1.2. REGISTRATION OF LEGAL ENTITIES**

The information and documents required for electronic registration for identifying legal entities will include the following:

#### **Information:**

- a) Business Name
- b) Corporate Taxpayer ID
- c) Date of Constitution
- d) Address
- e) Email
- f) Phone/Cellphone
- g) Main Activity
- h) Corporate structure, identifying all final beneficiaries with any involvement
- i) Names of Partners
- j) ID numbers of Partners
- k) Whether any Partner is or has been a Politically Exposed Person



- l) Social Capital
- m) Net Worth

**Documents:**

- a) Copy of Partners' Identification Documents
- b) Proof of Address
- c) Selfie of Administrator with Identification Document
- d) Signed Balance Sheet by an accountant
- e) Copy of Articles of Incorporation
- f) Other supplementary documents

**8.2. EMPLOYEE DUE DILIGENCE PROCESS: OASIS INTERNATIONAL SOLUTIONS FZCO** must follow internal procedures for employee selection and hiring, ensuring the adequate training for compliance with this policy and ensuring that employees' integrity is monitored to prevent involvement in illicit activities.

**8.3. EMPLOYEE IDENTIFICATION PROCESS:** This refers to procedures used to select and examine the financial situation and integrity of employees, aiming to prevent associations with individuals involved in illicit activities.

**8.4. SUPPLIER IDENTIFICATION PROCESS:** Procedures for identifying and accepting suppliers and service providers, ensuring no connection with dishonest or suspicious entities involved in illicit activities.

**8.5. PARTNER IDENTIFICATION PROCESS:** Procedures aimed at preventing business dealings with dishonest or suspicious counterparts, ensuring that they follow adequate AML/CFT procedures when applicable.

**9. TRANSACTION MONITORING**

**OASIS INTERNATIONAL SOLUTIONS FZCO**, with the assistance of the Compliance department, is responsible for monitoring operations to identify signs of Money Laundering and Terrorism Financing. The monitoring routines aim to detect, among other things, operations involving recurring counterparties, unjustified transfers, transactions with asset incompatibility, and those lacking economic rationale. Monitoring is conducted manually. Information that does not align with the rules defined in the compliance policy will prompt the compliance officer to generate a report detailing the non-conformities of the related entity. Additionally, the following circumstances require special attention:

1. Politically Exposed Person (PEP)
2. Atypical changes in address, bank account ownership, or power of attorney
3. Identification in sanction lists
4. Residing in/holding accounts/power of attorney in border regions
5. Transactions where the ultimate beneficiary cannot be identified
6. Currency exchange operations where the destination/origin country is a tax haven





All communication, data collection, and document evaluation are cataloged and recorded for analysis, generating a report to be reviewed by the management of **OASIS INTERNATIONAL SOLUTIONS FZCO** to determine whether there are signs of Money Laundering. Online search tools are used during the evaluation to gather information on the client's involvement in news that may affect their integrity, public sanction lists, and any client information available through public or private sources.

## **10. TRAININGS**

**OASIS INTERNATIONAL SOLUTIONS FZCO** provides training for its employees to review the concepts in this Policy and encourage the adoption of appropriate actions in cases of suspected Money Laundering and Terrorist Financing.

## **11. POLITICALLY EXPOSED PERSONS**

At the time of registration, every related entity is required to declare whether or not they are a Politically Exposed Person (PEP). If a client is identified as politically exposed, even if they have not self-declared, they will still be considered as such in analyses of Money Laundering indicators. All politically exposed entities are classified as high-risk. Compliance reviews the data in the report if atypicalities described in the current regulations are identified.

If it is confirmed that an entity is a Politically Exposed Person, **OASIS INTERNATIONAL SOLUTIONS FZCO** does not proceed with registration procedures or engage in any transactions.

## **12. BLOCKING OR TERMINATION OF RELATIONSHIPS**

If any signs of Money Laundering, corruption, or Terrorist Financing are identified, **OASIS INTERNATIONAL SOLUTIONS FZCO** may block or terminate the relationship.

## **13. MAINTENANCE OF INFORMATION AND RECORDS**

Documents related to operations, including recordings and registration documents, must be archived for a minimum of 5 years after the relationship ends or the last transaction.

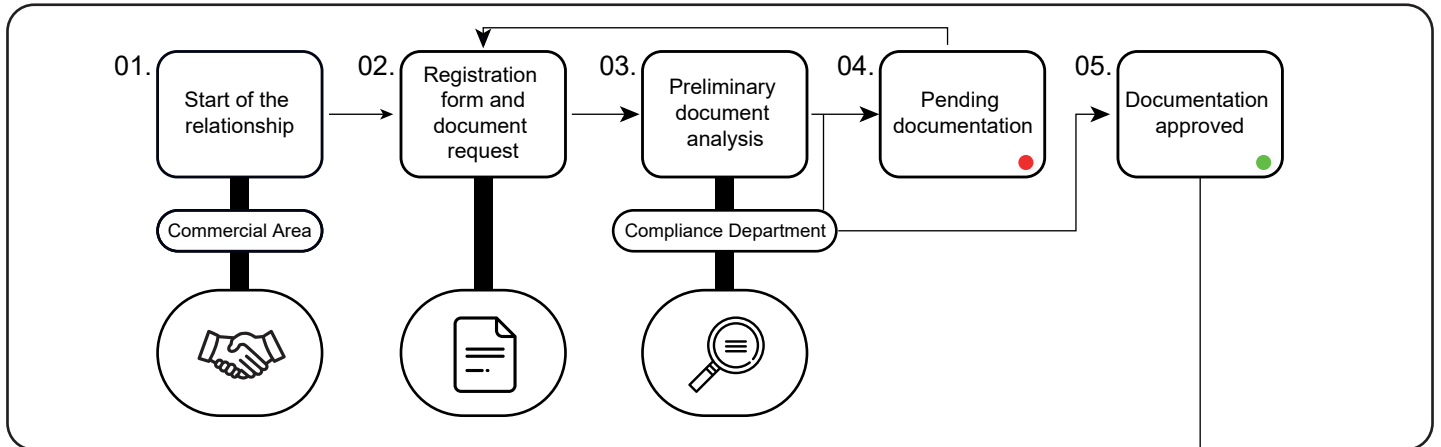
## **14. CONFIDENTIALITY OF INFORMATION**

All information regarding suspicions of Money Laundering and Terrorist Financing is confidential and must not be disclosed to the involved parties.

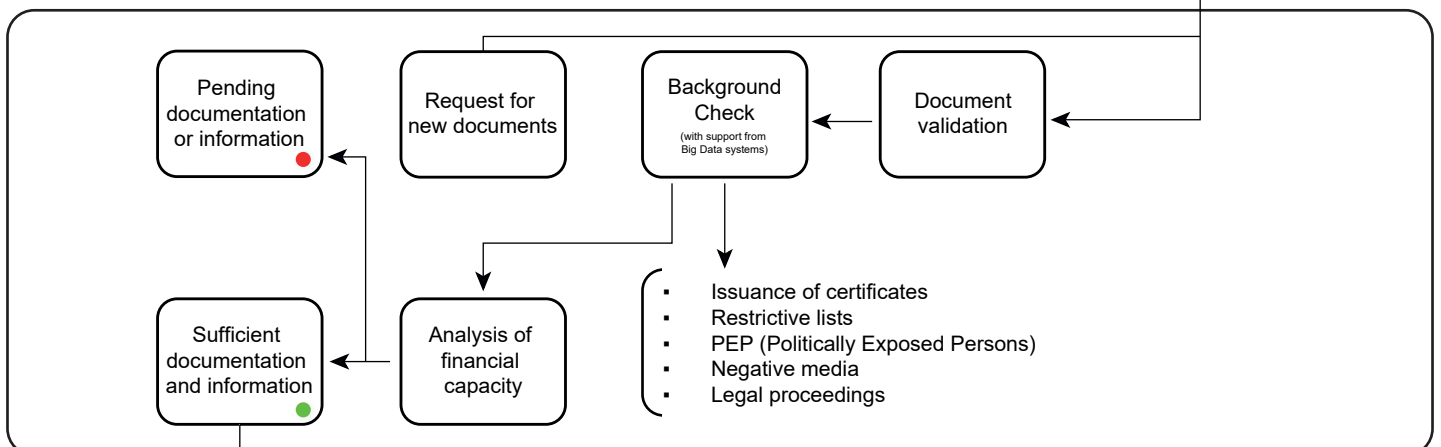
## **15. EXCEPTIONS AND APPLICABLE SANCTIONS**

Any exceptions to the rules in this Policy must be requested to Compliance with valid justification. Non-compliance with legal and regulatory provisions subjects employees, partners, and agents to penalties, ranging from administrative to criminal sanctions.

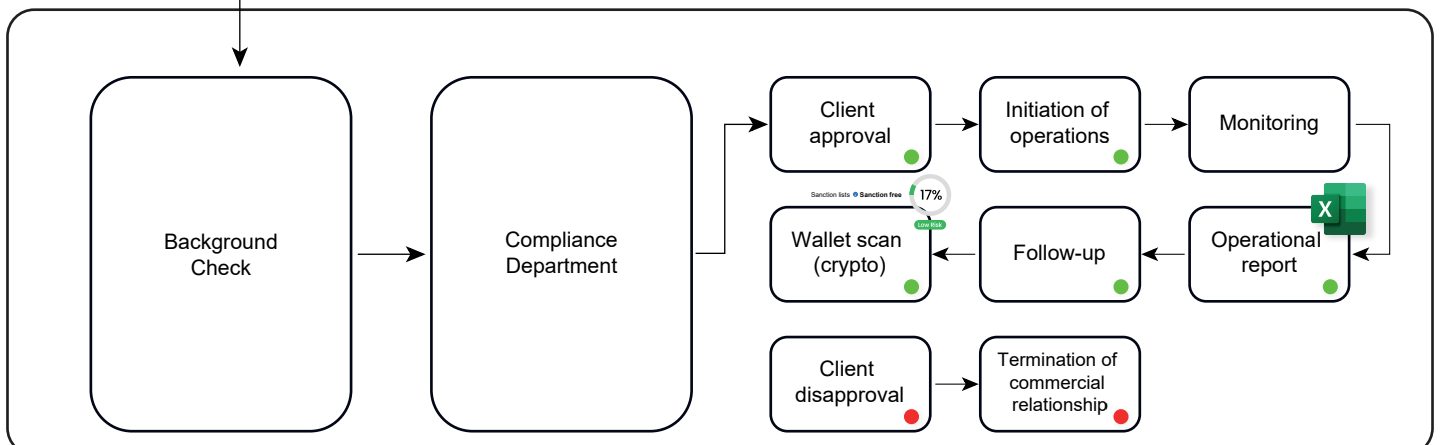
## REGISTRATION



## ENHANCED DUE DILIGENCE



## REPORTS AND MONITORING





## 16. WHISTLEBLOWING CHANNEL

**OASIS INTERNATIONAL SOLUTIONS FZCO** provides a communication channel for receiving reports of irregularities, including anonymous reports. Retaliation against whistleblowers is prohibited.

The channel is available to both internal and external stakeholders:

[compliance@oasisinternationalsolutions.com](mailto:compliance@oasisinternationalsolutions.com)

**OASIS INTERNATIONAL SOLUTIONS FZCO** guarantees confidentiality and protection for the good-faith whistleblower, implementing a transparent process regarding the handling of the complaint.

The complaint will be handled by the Compliance Department, which is responsible for gathering statements from the involved parties, reviewing any existing documentation, if applicable, and taking the necessary actions before forwarding the case to the Ethics and

Compliance Committee. The committee will then deliberate on the appropriate measures to be taken and the applicable penalties, depending on the final decision.

Update History	Version
2025/04	1.0
2025/05	1.1

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