

# VERTARA AML & SANCTIONS STATEMENT

Program Operator: Fortara Consultancy FZCO

Program: Vertara

*Effective upon acceptance*

This AML & Sanctions Statement ("Statement") sets out the anti-money laundering, counter-terrorist financing and sanctions compliance principles applicable to the Vertara Partner Program operated by Fortara Consultancy FZCO (the "Company").

This Statement forms part of the contractual framework between the Company and each Partner. It is accepted together with the Partner Terms and the Privacy Policy.

## 1. Purpose and Scope

1.1 The Company is committed to preventing the use of its services for money laundering, terrorist financing, sanctions evasion or any other illicit activity.

1.2 This Statement applies to:

- the Company and its personnel;
- all Partners participating in the Vertara Program; and
- all Referrals and related activities conducted through the Platform.

1.3 The Company operates under a licence for Management & Business Consultancy and Commercial Brokerage. The Company acts primarily as an introducer and transaction-structuring intermediary. The final credit decision, customer due diligence and ongoing monitoring in respect of any financing facility are performed by the relevant licensed bank or financial institution.

## 2. Core Commitments

The Company:

- (a) does not knowingly accept or process Referrals involving persons, entities or jurisdictions that are subject to applicable sanctions;
- (b) does not knowingly facilitate transactions that it has reasonable grounds to believe involve the proceeds of crime or terrorist financing;
- (c) applies a risk-based approach to its activities;
- (d) cooperates with licensed financial institutions and competent authorities in relation to compliance matters; and
- (e) expects the same standards of integrity from all Partners.

## 3. Sanctions

3.1 The Company does not engage with, and Partners must not introduce, any person or entity that is:

- (a) listed on sanctions lists maintained by the United Nations, the UAE, the European Union, the United Kingdom, the United States (OFAC) or other applicable sanctions authorities;
- (b) owned or controlled by a sanctioned person or entity; or
- (c) located in, or acting on behalf of, a comprehensively sanctioned jurisdiction.

3.2 Partners must not submit Referrals where they know or have reasonable grounds to suspect that the Client (or any beneficial owner or related party) is subject to sanctions.

## 4. Partner Obligations

4.1 Each Partner shall:

- (a) submit only Referrals that have been obtained lawfully;
- (b) provide accurate and complete information when creating a Referral;
- (c) not introduce Clients that the Partner knows or reasonably suspects are involved in money laundering, terrorist financing, sanctions evasion or other criminal activity;
- (d) promptly inform the Company if the Partner becomes aware of any suspicious circumstances relating to a previously submitted Referral or Client; and
- (e) cooperate with any reasonable compliance request made by the Company in connection with a Referral.

4.2 Failure to comply with this Clause may result in immediate suspension or termination of the Partner's access to the Program and may be reported to relevant authorities where required by law.

## 5. Risk-Based Approach and Internal Controls

5.1 The Company applies a risk-based approach to its introductory and structuring activities. This includes, where appropriate:

- screening of counterparties against sanctions lists;
- review of Referral information for obvious red flags;
- escalation of higher-risk cases for additional review; and
- cooperation with the compliance processes of the banks and financial institutions that ultimately provide the facilities.

5.2 The Company does not perform full customer due diligence on behalf of banks. Primary CDD, source-of-funds verification and ongoing monitoring remain the responsibility of the licensed financial institution that provides the facility.

5.3 The Company reserves the right to reject, suspend or close any Referral that presents unacceptable compliance risk.

## 6. Reporting of Suspicious Activity

6.1 Personnel of the Company are required to escalate internal concerns regarding potentially suspicious activity in accordance with the Company's internal procedures.

6.2 Where required by applicable UAE law, the Company will make reports to the relevant authorities (including through the appropriate channels of the Financial Intelligence Unit).

6.3 Partners who become aware of suspicious circumstances relating to a Client or Referral must notify the Company without delay, and in any event within three (3) business days of becoming aware of such circumstances. Partners must not tip off any person that a report or investigation may be under consideration.

## 7. Record Keeping

The Company retains records relating to Referrals, Partner onboarding and compliance reviews for such period as is required under applicable UAE law and the Company's internal policies.

## 8. Training and Awareness

The Company provides its relevant personnel with appropriate awareness of AML, sanctions and related compliance obligations. Partners are expected to maintain their own understanding of applicable legal and ethical standards when introducing Clients.

## 9. Governance

9.1 Overall responsibility for this Statement rests with the management of Fortara Consultancy FZCO.

9.2 The Company may update this Statement from time to time. Material changes will be notified through the Platform or by email. Continued participation in the Program after notification constitutes acceptance of the updated Statement.

## **10. No Regulatory Licence Sharing**

Nothing in this Statement, the Partner Terms or the Program shall be construed as the Company sharing, sublicensing or delegating any regulatory licence to a Partner. Partners act solely as independent introducers and do not conduct regulated financial or real estate brokerage activities under the Company's licence.