

Western Group Inc.

ANTI-MONEY LAUNDERING (AML) POLICY



In compliance with The Financial Intelligence and Anti-Money Laundering Act 2002 (FIAMLA 2002), the Prevention of Corruption Act 2002 (POCA 2002) and the Prevention of Terrorism Act 2002 (POTA 2002), Western Group Inc has adopted an Anti-Money Laundering (AML) compliance policy ("Policy") as set forth in the Board minutes.

Scope of Policy:

This policy applies to all Western Group Inc Officers, Employees, Brokers, Partners, associated 3rd parties to Western Group Inc, Product and Services offered by the Western Group Inc. It is the policy of Western Group Inc to prohibit and actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.

For the purposes of the Policy, money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have been derived from legitimate origins or constitute legitimate assets.

All business units and locations within Western Group Inc will cooperate to create a cohesive effort in the fight against money laundering. Each business unit and location has implemented risk-based procedures reasonably expected to prevent, detect and cause the reporting of transactions required under the FIAMLA.

All efforts exerted will be documented and retained in accordance with the FIAMLA. The AML Compliance Committee is responsible for initiating Suspicious Activity Reports ("SAR's") or other required reporting to the appropriate law enforcement or regulatory agencies. Any contacts by law enforcement or regulatory agencies related to the Policy shall be directed to the AML Compliance Committee.

The AML Compliance Committee will confirm each and every client submitted the following documents to ensure their identity-

- 1) Passport or Driver License
- 2) Utility Bills to confirm address proof
- 3) Business Registration Documents for corporate clients
- 4) TAX registration certificate if any
- 5) Any other related documentation

The Committee also ensures that Western group Inc. never accepts cash or disburses cash under any conditions. It also requires proper authentication in case of any deposit or withdrawal involved. The company does not accept any kind of third-party transfers.

Western Group Inc will not go into any business deal with anyone or group assumed of or directly involved in money laundering, or where funds have been sources or ends of an illegitimate activity. Western Group Inc legally bound to report such delinquency to the appropriate authorities and as such the issue, company and its owners may be the subject to a criminal investigation.

To satisfy the Prevention of Terrorism Act 2002 (POTA 2002), Western Group Inc verifies the submitted documents is original and not false or forged. For verification purpose Western Group Inc go through global database, global sanctions reports, government watch lists, Interpol's watch list and accurate screening processes. For suspected client/activity Western Group Inc asks additional documents and information about individual or business dealings based on geographical locations.

Western Group Inc is committed to update its electronic system to inspect suspicious activities and regular verification of client's records as per the introduction of any new regulations. Employees will also be trained to ensure that the anti-money laundering procedures are rationalized and followed appropriately from time to time