

# GATE EXPRESS'S AML/CTF AND SANCTIONS REGIME

GATE EXPRESS is committed to protect the safety, soundness and reputation of GATE EXPRESS by reducing the likelihood that GATE EXPRESS will be used as a vehicle for, or become a victim of, Money Laundering or Counter Terrorist Financing (ML/CTF) activities. Furthermore, GATE EXPRESS is also committed to comply with applicable Economic Sanctions laws and prevent activities involving sanctions targets.

Anti-Money Laundering Officer (AMLO) is responsible to Senior Management of Calypso Pay for establishing and maintaining GATE EXPRESS's Anti-Money Laundering and Anti-Terrorist Financing (AML/CTF) and Sanctions programs. The AML/CTF and Sanctions programs include the following core elements:

- Oversight by Senior Management
- Documented policies and procedures that address regulatory requirements
- Training for employees and those who act on behalf of GATE EXPRESS
- Risk assessments
- Testing of control effectiveness
- Client identification
- Record keeping and retention
- Ongoing monitoring
- Regulatory reporting

The AML/CTF and Sanctions programs are delivered by employees in the Global Anti-Money Laundering Policy, made up of teams of specialists who use analytics, innovative technology and professional expertise to detect and deter ML/CTF and manage sanctions compliance.