

# SPARK GROUP

## Anti-Money Laundering Policy

### 1. Introduction

Sparklink Vehicle Services is committed to maintaining the highest standards of integrity, transparency, and legal compliance. This Anti-Money Laundering (AML) policy is designed to prevent the organization from being used to facilitate money laundering, terrorist financing, or any other illegal activities. This policy applies to all employees, contractors, agents, and representatives of Sparklink Vehicle Services.

### 2. Responsibilities

#### 2.1 Management Responsibilities

Management at Sparklink Vehicle Services is responsible for ensuring the effective implementation of this AML policy. This includes:

- a) Designating a Compliance Officer who will oversee and enforce the policy.
- b) Providing adequate resources and training to employees to enable them to comply with the AML policy.
- c) Regularly reviewing and updating the AML policy to reflect changes in regulations and industry best practices.
- d) Establishing an effective framework for identifying and reporting suspicious activities.

#### 2.2 Employee Responsibilities

All employees of Sparklink Vehicle Services are responsible for:

- a. Familiarizing themselves with and adhering to this AML policy.
- b. Completing mandatory AML training programs as required.
- c. Identifying and reporting any suspicious transactions or activities in accordance with the procedures outlined in this policy.
- d. Cooperating fully with internal and external investigations related to money laundering or other illegal activities.

### **3. Know Your Customer (KYC) Procedures**

Sparklink Vehicle Services will implement robust Know Your Customer (KYC) procedures to verify the identity and assess the risk associated with its customers. These procedures may include:

- a. Collecting and verifying customer identification information, such as name, address, date of birth, and government-issued identification documents.
- b. Conducting risk assessments based on customer profiles, business activities, and transaction patterns.
- c. Ongoing monitoring of customer relationships to detect any unusual or suspicious activities.

### **4. Reporting Suspicious Transactions**

#### **4.1 Identification of Suspicious Transactions**

All employees of Sparklink Vehicle Services are obligated to report any transactions or activities that appear unusual, suspicious, or inconsistent with the customer's known or declared business or financial circumstances. Such activities may include:

- Large cash transactions without a reasonable explanation.
- Multiple transactions under the reporting threshold that appear structured to avoid detection.
- Transactions involving high-risk jurisdictions or individuals with questionable backgrounds.
- Unusual patterns of deposits, withdrawals, or transfers.

#### **4.2 Reporting Process**

- a. Employees should promptly report any suspicious transactions to their immediate supervisor or the designated Compliance Officer.
- b. The Compliance Officer will evaluate the report and determine whether to file a Suspicious Activity Report (SAR) with the appropriate regulatory authorities.
- c. Confidentiality will be maintained throughout the investigation process, and employees will be protected from any retaliation for reporting suspicious transactions in good faith.

## **5. Record Keeping**

Sparklink Vehicle Services will maintain appropriate records of customer identification, transactional data, and suspicious activity reports. These records will be retained for the period mandated by applicable laws and regulations.

## **6. Training and Awareness**

Sparklink Vehicle Services will provide regular AML training programs to employees to ensure they understand their responsibilities, recognize suspicious activities, and comply with this policy. The training will be tailored to the specific roles and functions of the employees.

## **7. Non-Compliance and Consequences**

Failure to comply with this AML policy may result in disciplinary action, including termination of employment. Additionally, non-compliance with legal and regulatory obligations may expose Sparklink Vehicle Services and its employees to civil and criminal penalties.

## **8. Policy Review**

This AML policy will be reviewed at least annually or whenever there are significant changes in regulatory requirements or business operations.

