



DATUM
ADVANCED COMPOSITES

Datum

Anti-Money Laundering and Counter-Terrorist Financing Policy

VERSION 1.0

DATUM COMPANY POLICY

LEARN • INNOVATE • TOGETHER

**DELIVERING ADVANCED COMPOSITE SYSTEMS AND
SPECIALIST ENGINEERING SERVICES WITH PRIDE**



CONTENTS



01 Scope and Purpose of this Policy	... 03
02 Policy Overview	... 04
03 Definitions	... 05
04 Procedures	... 06
05 Frequently Asked Questions	... 07

01

SCOPE AND PURPOSE OF THIS POLICY

TO WHOM DOES THIS POLICY APPLY?

This Anti-Money Laundering and Counter-Terrorist Financing Policy (hereinafter referred to as "the Policy") applies to all employees, contractors, and agents of Datum Advanced Composites Private Limited, and anyone else acting on Datum's behalf.

PURPOSE OF THIS POLICY

The purpose of this Policy is to establish a comprehensive framework to prevent and detect money laundering and counter-terrorist financing activities in accordance with applicable laws and regulations in India. Datum is committed to maintaining the highest ethical standards and compliance with anti-money laundering and counter-terrorist financing laws.

02

POLICY OVERVIEW

Datum Advanced Composites Private Limited is committed to adhering to rigorous Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) practices. This policy outlines our dedication to preventing the illicit flow of funds and ensuring compliance with all relevant laws and regulations.

KEY PRINCIPALS

Identification and verification of Third-Party and beneficial owners.

Ongoing monitoring of Third-Party transactions.

Reporting suspicious activities.

Staff training and awareness.

Compliance with all relevant legal and regulatory requirements.

DO

- △ Conduct thorough Third-Party due diligence.
- △ Report any suspicious transactions to the appropriate authorities.
- △ Provide ongoing training to staff to ensure awareness of AML/CFT regulations.
- △ Maintain accurate records of Third-Party information and transactions.

DON'T

- △ Engage in any transaction that raises suspicion or violates AML/CFT regulations.
- △ Conceal or ignore any red flags related to potential money laundering or terrorist financing.
- △ Neglect to report suspicious activities or transactions promptly.

03

DEFINITIONS

ANTI-MONEY LAUNDERING (AML)

AML refers to a set of laws, regulations, and procedures designed to prevent individuals and organizations from disguising the illegal origins of money obtained through criminal activities as legitimate funds. The primary goal of AML measures is to detect and deter money laundering activities, thereby preserving the integrity of the financial system, and preventing it from being used for illicit purposes. AML measures typically involve Third-Party due diligence, reporting of suspicious transactions, and maintaining records to trace financial activities.

COUNTER-TERRORIST FINANCING (CTF)

CTF is a subset of AML efforts that focuses specifically on preventing the financial support of terrorist organizations and activities. CTF measures aim to identify and disrupt the flow of funds used to facilitate acts of terrorism and support individuals or entities involved in terrorism.

THIRD-PARTY DUE DILIGENCE

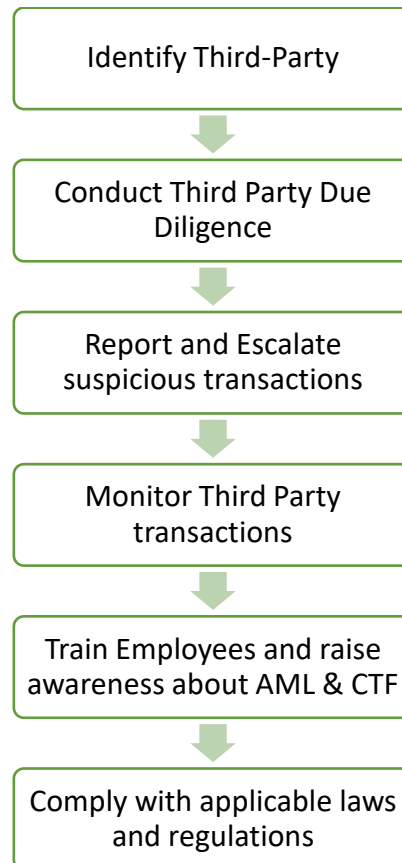
Third-Party Due Diligence is the process of assessing and understanding the risks associated with a Third-Party, supplier, or partner. It involves gathering information about a Third-Party's identity, source of funds, and business activities to determine the level of risk they pose for money laundering or terrorist financing.

RED FLAGS

Red flags are warning signs or indicators that suggest possible money laundering or terrorist financing. AML & CTF are designed to recognize and act upon these red flags to prevent illicit financial activities.

04

PROCEDURES



05

FREQUENTLY ASKED QUESTIONS

What is the purpose of this policy?

The purpose of this policy is to prevent and detect money laundering and counter-terrorist financing activities.

Who does this policy apply to?

This policy applies to all employees, contractors, and suppliers of Datum Advanced Composites Private Limited and those acting on Datum's behalf.

What are the key principles of this policy?

The key principles include Third-Party identification and verification, ongoing transaction monitoring, reporting of suspicious activities, staff training, and compliance with legal requirements.

What should employees do regarding Third-Party transactions?

Employees should conduct thorough Third-Party due diligence, report suspicious transactions, provide staff training, and maintain accurate records.

What actions should employees avoid?

Employees should avoid engaging in transactions that raise suspicion or violate AML/CFT regulations, concealing red flags, and neglecting to report suspicious activities.

Key Reference Documents

- △ Datum Global Code of Conduct
- △ Indian AML/CFT Laws and Regulations
- △ Third-Party Due Diligence User Guide and Form

Key Contacts

- △ Head of Legal and Compliance
- △ Datum Senior Leadership
- △ Legal Counsel
- △ Regulatory Authorities

DATUM



ADVANCED COMPOSITES

DATUM ADVANCED COMPOSITES PRIVATE LIMITED
117 / H2 / 124, PANDU NAGAR, KANPUR – 208005, UTTAR PRADESH, INDIA

WWW.DATUMLIMITED.COM
CIN: U29308 UP2020 PTC128807 | GSTIN: 09 AAHCD 7509 H1ZG

Copyright © 2020 Datum Advanced Composites Private Limited – All Rights Reserved.
Its product and service designations are protected trademarks.

Proprietary document. This document and all rights, titles, interests in and to its content are the sole property of Datum Advanced Composites Private Limited. No intellectual property rights are granted by the delivery of this document or the disclosure of its content. This document shall not be reproduced or disclosed to a third party without the express written consent of Datum Advanced Composites Private Limited.

This document and its content shall not be used for any purpose other than that for which it is supplied. The statements made herein do not constitute an offer. They are based on the mentioned assumptions and are expressed in good faith. Where the supporting grounds for these statements are not shown, Datum Advanced Composites Private Limited will be pleased to explain the basis thereof.