



**Anti-Money Laundering and
Counter-Terrorism Financing
(AML-CTF) Policy**

Parablu Inc.

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Policy Summary

Parablu is committed to conducting its business in accordance with all applicable laws and regulations, and in a way, that enhances its reputation in the market. This policy records Parablu's approach to the identification, mitigation, and management of the risk that Parablu's products and services might be involved in the facilitation of money laundering or the financing of terrorism.

1. Description of money laundering and terrorism financing

- Parablu defines money laundering ("ML") as an activity that is designed to conceal or disguise the true origin of criminally derived proceeds in order to make them appear to have been sourced from legitimate sources.
- Terrorist Financing ("TF") is considered to be the act of providing financial support to terrorism or terrorist organizations to enable them to carry out acts of terrorism.

2. Objectives of Parablu AML/CTF policy

Parablu has established an AML/CTF policy that sets the core principles for the management of ML/TF risk. The policy is global in nature and outlines worldwide standards to meet regulatory and ethical obligations in the economies in which Parablu does business. This contributes to the stability, integrity, and strength of the global financial system and protects Parablu from reputational damage and regulatory action. The Policy is subject to regular review to ensure it remains current with regulator expectations and industry standards.

3. The core principles

Parablu has adopted the following core principles:

- Parablu opposes the crimes of money laundering and terrorist financing and maintains a framework to identify and mitigate the risk that its products and services could be used for such purposes.
- Parablu reports any activity that it detects which is suspicious and may involve potential money laundering or terrorism financing to the applicable regulator.
- Parablu will comply with the AML/CTF laws, rules, and regulations of the countries that relate to AML/CTF where Parablu has permanent places of business through which Parablu provides services.
- Parablu will endeavor to provide its products and services only for legitimate purposes to customers whose identities Macquarie has been able to reasonably ascertain.
- Parablu will take reasonable steps to ensure that sufficient funding and resources are available for the implementation and performance of activities required by Parablu's AML/CTF Program.
- Parablu monitors its customers, and their transactions, consistent with the level of money laundering and terrorist financing risk they represent.

Parablu will manage new and revised changes to Parablu's products, business processes, and systems to ensure that money laundering and terrorist financing risks are identified and managed.

4. Know your customer ("KYC")

Parablu endeavors to follow all KYC policies and procedures relevant to the regions in which it operates. Applicable KYC policies and procedures to establish and verify the identity and bona fides of customers will also be complied with.

These will include:

- Customer acceptance procedures that identify types of customers and transactions likely to pose a higher than average risk to Parablu and require a higher level of due diligence;
- Procedures to establish if customers are known or suspected money launderers, terrorists or otherwise engaged in criminal activity (e.g., reviewing customers against government/United Nations/regulators' lists of proscribed persons);
- A risk-based periodic review of existing customer records to maintain currency and completeness;
- Procedures prohibiting accounts/relationships, including payment processing, with shell banks;
- A clear statement on what records must be kept on customer identification and individual transactions and their retention period; and
- Regular compliance reviews and independent audits of AML/CTF program and procedure documents and execution against established standards.

5. Suspicious activity

Parablu staff are trained and made aware of "red flags", or anything that is unusual or out of the ordinary when dealing with customers and customer-related information. Parablu has the relevant procedures and processes in place to ensure that any genuinely suspicious matters are detected and escalated for review by senior management.

6. Parablu AML/CTF training program

Parablu is in the process of implementing an AML/CTF Training Program to educate employees in implementing and maintaining the Parablu AML/CTF Program. All employees will undergo initial AML/CTF training when they join Parablu. In addition, there will be ongoing training requirements for all employees.

7. Parablu's record retention

Parablu's requires retention of records for as long as required by applicable laws, rules, and regulations.