

THE POLICY DISPLAYED WAS APPROVED BY THE ERSTWHILE BOARD OF DIRECTORS OF THE COMPANY IN ITS MEETING HELD ON 5TH DECEMBER 2024, THIS POLICY HAS BEEN PUBLISHED ON THE WEBSITE OF THE COMPANY TO COMPLY WITH REGULATION 46 OF THE SEBI (LODR) REGULATIONS, 2015. THE BOARD OF THE COMPANY MAY MODIFY, ADD, DELETE OR AMEND ANY OF THE PROVISIONS OF THIS POLICY TIME TO TIME.

ICODEX PUBLISHING SOLUTIONS LIMITED
Anti-Money Laundering (AML) Policy

1. Introduction

iCodex Publishing Solutions Limited (“the Company”) has implemented this Anti-Money Laundering (AML) Policy. This policy is intended to establish robust practices for identifying, preventing, and reporting any suspected money laundering activities and ensuring the Company’s compliance with legal and regulatory requirements. This Anti-Money Laundering (AML) Policy signifies the Company’s unwavering commitment to maintaining integrity, ensuring regulatory compliance, and actively preventing financial crimes, including money laundering and terrorist financing. By fostering a culture of compliance and vigilance, we aim to protect the Company and its stakeholders from potential risks associated with money laundering activities.

2. Objective

The primary objective of this policy is to prevent the Company’s operations from being misused for money laundering or terrorist financing activities. The policy serves as a guideline for implementing effective AML controls, maintaining comprehensive records, and appropriately handling and reporting any suspicious activities to prevent money laundering.

3. Scope

This policy is applicable to all employees, directors, and associated entities of the Company. It encompasses all aspects of the Company’s business dealings and clearly outlines the procedures for:

- Customer due diligence
- Reporting suspicious activities
- Monitoring transactions for signs of money laundering

4. AML Practices

The Company is committed to implementing the following AML practices:

4.1 Customer Due Diligence (CDD)

- Conduct thorough due diligence on clients, partners, and any third parties.
- Verify identities through reliable, independent sources (e.g., government-issued identification).
- Assess the risk of money laundering by evaluating the nature of the customer’s business, geographic risks, transaction patterns, and other relevant factors.

4.2 Record-Keeping

- Maintain accurate records of all transactions, customer activities, and due diligence checks.

- Ensure the records comply with regulatory requirements and are sufficient to support any investigation into customer activities or transactions.

4.3 Monitoring Transactions

- Implement systems to regularly monitor transactions for unusual or suspicious activity.
- Identify transactions that are inconsistent with the customer's known profile, history, or the nature of their business.
- Use automated tools and periodic audits to enhance monitoring effectiveness.

5. Reporting of Suspicious Activities

Employees must promptly report any suspicious activities or transactions to the designated AML Compliance Officer. The Company will ensure that:

- All reports are documented thoroughly.
- Necessary follow-up actions are taken, including further investigation.
- If mandated, suspicious activities will be reported to the appropriate regulatory authorities in accordance with applicable laws and regulations.

6. Responsibilities

The responsibilities concerning the AML Policy are outlined as follows:

AML Compliance Officer:

- Oversee the implementation and enforcement of the AML Policy.
- Ensure compliance with all relevant regulatory obligations.
- Provide guidance to employees on AML-related matters.

Employees:

- Comply with the AML Policy and relevant procedures.
- Report any suspicious activities or transactions to the AML Compliance Officer immediately.

7. Training and Awareness

The Company shall conduct regular training programs to educate employees about AML practices, risk indicators, and the proper reporting processes. Training sessions will cover:

- The importance of compliance with AML policies.
- Procedures for identifying and reporting suspicious activities.
- Updates on relevant laws, regulations, and best practices in AML.

8. Review of the Policy

The AML Policy will undergo periodic reviews to ensure alignment with evolving regulatory requirements and industry best practices. Any amendments or updates to the policy will require approval from the Board of Directors.