Connect Financials
FUTURE PARTNERS

Anti-Money Laundering (AML) & Counter-Financing of Terrorism (CFT) Policy

Connect Financials LLC (Comoros)

January 2025

Company Legal Information

Company Name:

Company Registered No.:	Connect Financials LLC
Company License No.:	HY00523008
Registered Office:	T2023300
Physical Office:	Bonovo Road – Fomboni, Island of Mohéli – Comoros Union
Contact:	Taki Sofokleous 23A, 2049 Strovolos, Nicosia, Cyprus
Website:	+357 2225 0435 | info@connectfinancials.com
	www.connectfinancials.com

1. Purpose and Regulatory Framework This AML/CFT Policy outlines the principles and measures adopted by Connect Financials LLC to prevent money laundering (ML) and terrorist financing (TF). The Company complies with the Comoros AML/CFT Act 2021, directives from the Financial Intelligence Unit (FIU), and FATF international standards.

2. Policy Statement

Connect Financials LLC enforces a zero-tolerance approach to financial crime. The Company is committed to identifying, assessing, and mitigating ML/TF risks, maintaining transparency, and cooperating fully with regulatory and law enforcement authorities.

3. Customer Due Diligence (CDD) & Verification

Before any business relationship is established, full customer verification is conducted. Identification documents, proof of address, and beneficial ownership details are obtained and verified. Enhanced Due Diligence (EDD) is applied to Politically Exposed Persons (PEPs) and high-risk clients.

4. Ongoing Monitoring & Record-Keeping

Customer transactions are continuously monitored for unusual activity. Records of identification data, account history, and transaction details are securely maintained for at least five years after the relationship ends.

5. Sanctions & Screening

All clients are screened against UN, EU, OFAC, and Comoros FIU sanctions lists during onboarding and periodically thereafter. Any matches are escalated to the Money Laundering Reporting Officer (MLRO) for immediate review.

6. Suspicious Transaction Reporting (STR)

Employees must promptly report any suspicion of ML/TF to the MLRO. The MLRO evaluates and, if necessary, files a Suspicious Transaction Report with the Comoros FIU. Tipping-off clients is strictly prohibited.

7. Staff Training & Awareness

All staff receive ongoing AML/CFT training to recognize red flags, understand legal duties, and report suspicious activities. Training sessions are documented and updated annually.

8. Compliance Oversight

The Compliance Officer/MLRO ensures enforcement of this policy, oversees periodic reviews, and reports findings to management. Independent audits may be conducted to test the policy's effectiveness.

9. Legal Responsibility and Cooperation

Connect Financials LLC cooperates with all Comoros regulatory and judicial authorities. Non-compliance with this policy or AML laws may lead to disciplinary action and legal consequences.

10. Contact Information

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11. Legal Notice