

COMPLIANCE POLICY



# Anti-Money Laundering Policy

*Customs Clearance, Transit & Logistics — Ex-Grand Katanga, D.R. Congo*

<b>Document Title</b>	Anti-Money Laundering (AML) Policy
<b>Document Owner</b>	CORRIDEX SARL — Management
<b>Version</b>	1.0
<b>Effective Date</b>	[DATE]
<b>Review Cycle</b>	Annual, or upon regulatory change
<b>Applies To</b>	All employees, contractors, agents, and representatives of CORRIDEX SARL

## 1. Purpose

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Money laundering is the process of disguising the proceeds of illegal activity as legitimate funds or trade. Customs clearance, transit, and freight brokerage businesses are recognised globally as a sector vulnerable to trade-based money laundering — through over- or under-invoicing, misclassification of goods, phantom shipments, or layered payment structures involving multiple jurisdictions.

This Policy sets out CORRIDEX SARL's commitment to preventing the Company, knowingly or unknowingly, from being used as a vehicle for money laundering or the financing of illegal activity, and the practical steps employees must follow to identify and escalate suspicious activity.

## 2. What Is Trade-Based Money Laundering

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In our sector, money laundering risk typically appears through manipulation of trade documentation and payment flows rather than through cash alone. Common patterns include:

- Over-invoicing or under-invoicing the declared value of goods to move value across borders disguised as trade.
- Misclassifying goods (wrong HS code) to disguise the true nature of a shipment or avoid scrutiny.
- Multiple invoicing — the same shipment invoiced more than once to different entities.
- Phantom shipments — documentation for goods that do not exist or are never actually shipped.
- Payments for clearance or transport services made by unrelated third parties, in unrelated jurisdictions, with no clear business rationale.
- Requests to receive payment in cash, in a different currency or jurisdiction than the contract specifies, or split into multiple smaller payments without clear reason.

## 3. Know Your Client (KYC)

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Before onboarding a new client or counterparty, or accepting a significant new shipment from an existing client, CORRIDEX takes reasonable steps to understand who it is dealing with:

1. Confirm the legal identity of the client (company registration, RCCM number where applicable, or equivalent in the relevant jurisdiction).
2. Understand the nature of the client's business and whether the goods being shipped are consistent with that business.
3. Identify the ultimate beneficial owner where the client structure is unusually complex or opaque.
4. Be alert where a client, shipment, or payment instruction changes unexpectedly without clear business explanation.

## 4. Red Flags — Indicators of Possible Money Laundering

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### WARNING SIGNS TO WATCH FOR

The declared value of goods is significantly inconsistent with market value, weight, or volume.

A client insists on a specific, unusual HS code classification without commercial justification.

Payment is offered from a party with no apparent connection to the buyer, seller, or shipment.

A client is unwilling to provide basic company or ownership information.

A shipment's documented route makes little commercial sense (e.g. unnecessary detours through

additional jurisdictions).

Urgent pressure to process a shipment or payment without normal verification, "no questions asked."

Cargo description is vague, inconsistent across documents, or changes after the shipment has already started moving.

No single red flag automatically means money laundering is taking place — but any of these should prompt closer review before proceeding, and should be escalated to management if they cannot be reasonably explained.

## 5. Employee Responsibilities

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- Never agree to misstate the value, quantity, classification, or origin of goods on any document, regardless of client instruction.
- Never accept payment instructions that are inconsistent with the commercial terms of the underlying shipment without escalating first.
- Maintain complete, accurate documentation for every shipment — invoices, packing lists, certificates of origin, and transport documents — and retain records as required by law.
- Report any of the red flags above, or any other transaction that "does not feel right," to management promptly.

## 6. Reporting Suspicious Activity

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Any employee who identifies a suspicious transaction, client, or instruction must report it to management immediately and before proceeding with the transaction wherever possible. Reports will be treated confidentially. CORRIDEX will, where required by DRC law or the law of any relevant jurisdiction, report suspicious activity to the competent financial intelligence or regulatory authority.

No employee will face retaliation for raising a genuine concern, declining to proceed with a suspicious transaction, or for the resulting delay to a shipment or client relationship.

## 7. Record-Keeping

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CORRIDEX maintains shipment, invoicing, and client identification records in accordance with DRC legal requirements and sound business practice, to ensure that transactions can be reconstructed and reviewed if required by an authority.

## 8. Consequences of Violation

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Any employee who knowingly facilitates a transaction in violation of this Policy will face disciplinary action up to and including termination, and the matter may be referred to the relevant authorities. CORRIDEX will terminate relationships with clients, agents, or subcontractors found to be using the Company's services for money laundering purposes.

## 9. Training and Acknowledgement

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All employees involved in client onboarding, documentation, or financial processing will receive training on this Policy upon joining the Company and periodically thereafter.

**Acknowledged by:**

Name: \_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

Date: