



## 1. Introduction

Lynkme.Pay, a payment platform operated under B Zone S.A.L. in Lebanon, is committed to upholding the highest standards of integrity, transparency, and compliance in all financial activities. In line with our mission to provide a safe and trusted platform for global transactions, we adhere strictly to international Anti-Money Laundering (AML) regulations, ensuring robust procedures to prevent money laundering, terrorism financing, and other financial crimes.

This AML Policy is designed to comply with applicable laws and regulations in Lebanon and internationally. The policy covers all business operations, including client onboarding, transaction monitoring, and reporting, while safeguarding the platform against misuse.

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## 2. Objectives of the AML Policy

- Prevent Lynkme.Pay from being used as a channel for illicit financial activities, including money laundering, terrorism financing, or other financial crimes.
  - Protect the platform's integrity by implementing effective Know Your Customer (KYC), Know Your Business (KYB), and Know Your Transactions (KYT) controls.
  - Ensure compliance with international AML regulations, including those from the Financial Action Task Force (FATF) and relevant local Lebanese regulations.
  - Maintain a high standard of due diligence in customer onboarding and transaction monitoring.
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## 3. AML Framework

### 3.1 Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD)

- **Know Your Customer (KYC):** Lynkme.Pay employs a robust KYC process to verify the identity of individual users. This includes gathering information such as government-issued identification, proof of address, and, where applicable, additional information for enhanced due diligence.
- **Know Your Business (KYB):** For corporate clients and business accounts, Lynkme.Pay requires detailed information on the nature of the business, ownership structure, source of funds, and beneficial owners. Enhanced due diligence (EDD) is performed for high-risk clients.



- **Know Your Transactions (KYT):** Lynkme.Pay utilizes automated KYT systems to monitor transactions on the platform. This includes identifying and flagging any unusual, large, or suspicious transactions, which are then reviewed by our compliance team.

### 3.2 Geographic Restrictions

Lynkme.Pay does not support or accept transactions, accounts, or business relationships from certain high-risk jurisdictions and sanctioned countries, in line with international regulations. Specifically:

- **Prohibited Jurisdictions:** Lynkme.Pay does not accept users, businesses, or freelancers located in or operating from the United States, Canada, or the United Kingdom.
- **Sanctioned Countries:** Lynkme.Pay strictly prohibits transactions involving North Korea and any other country subject to comprehensive international sanctions.
- This policy is regularly updated to align with changing international sanctions lists.

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## 4. Transaction Monitoring and Reporting

Lynkme.Pay is committed to continuously monitoring all transactions for suspicious or unusual activity. Our transaction monitoring includes:

- **Real-Time Monitoring:** Using automated KYT tools, Lynkme.Pay tracks transaction patterns that may indicate suspicious activities.
- **Suspicious Activity Reports (SARs):** Any transaction flagged as suspicious is investigated and, if warranted, reported to relevant regulatory authorities, as required by law.
- **Threshold Limits and Alerts:** Transactions exceeding certain threshold amounts trigger additional reviews by the compliance team, ensuring transparency and risk management.

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## 5. Employee Training and Compliance Culture

Lynkme.Pay promotes a compliance-focused culture within the company and ensures that employees receive regular training on AML policies, procedures, and red flags for potential money laundering activities. This training is designed to equip staff with the knowledge required to recognize and report suspicious activities in line with AML protocols.



## 6. Record Keeping

Lynkme.Pay maintains comprehensive records of all transactions, customer information, and due diligence documentation, in accordance with regulatory requirements. All records are kept for a minimum period of five years from the termination of the business relationship or the date of the transaction, whichever is longer. This record-keeping is essential for facilitating audits and regulatory reviews.

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## 7. Review and Updates to the AML Policy

This AML Policy is reviewed annually and updated as necessary to ensure compliance with changing regulations and emerging risks. The compliance team at Lynkme.Pay is responsible for overseeing updates, which are communicated to all relevant stakeholders.

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## 8. Reporting of AML Violations

Any employee or stakeholder who becomes aware of a potential violation of this AML Policy or related regulations must report it to the compliance team immediately. Reports are handled confidentially and without retaliation.

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## 9. Conclusion

Lynkme.Pay remains steadfast in its commitment to preventing money laundering, terrorism financing, and other financial crimes. We are dedicated to providing a secure platform that supports our users and partners in a compliant, trustworthy manner.

**For further information, please contact:**

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