

## Introduction

For purposes of this Document, the terms "we," "us," and "our" refer to Mt.Cook Financial ("MT.COOK"). Mt.Cook is a multi-entity, and multi-jurisdictional group of companies consisting of Mt.Cook South Africa, and Mt.Cook International (together, the "Mt.Cook Group of Companies").

Mt.Cook South Africa: is a trading name for "Atlantic Pearl Financial (PTY) Ltd" (Registration Number: 2019/140800/07), who are a licensed FSP and are authorised and regulated in South Africa by the Financial Sector Conduct Authority (FSCA), holding FPS Number 50420.

Mt.Cook International: is a trading name for "Atlantic Pearl Ltd.", who are incorporated in The Commonwealth of Dominica as an International Business Company with registration number 17164 (Bloomberg LEI: 254900XZNPUMGKTRK15). Atlantic Pearl Ltd is also registered locally in South Africa (Registration #: 2020/720330/10) and are a duly appointed Juristic Representative of Atlantic Pearl Financial (Pty) Ltd, (Registration # 2019/140800/07) which is an authorised Financial Services Provider under the Financial Advisory and Intermediary Services Act No 37 of 2002 – FSP# 50420. As such Atlantic Pearl Ltd renders financial services to clients on behalf of Atlantic Pearl Financial (Pty) Ltd.

*All references on this document and the group's website to "Mt.Cook" refer to the Mt.Cook Group of Companies. The website for Mt.Cook is [www.mtcookfinancial.com](http://www.mtcookfinancial.com).*

## Anti-money Laundering

MT.COOK does not tolerate money laundering and supports the fight against money launderers. MT.COOK'S AML/KYC protocol has been built by a leading AML/KYC consultancy firm to be fully compliant with, and strictly adhere to both local South African, as well as global Anti-money Laundering and Countering Financing of Terrorism Acts.

Recently MT.COOK further upgraded this policy to also comply with international standards by aligning it with global canons as set by the Financial Action Task Force (FATF) and other international organizations such as the United Nations, Basel Committee and Wolfsberg Group.

The most significant change to MT.COOK's current AML/CFT environment was the shift from operating in a prescriptive reporting regime to that of a pro-active risk based management regime whereby reporting entities are considered best placed to identify their money laundering and terrorist financing risks in respect to their business operations.

MT.COOK has various policies in place to deter people from laundering money. A brief overview of these policies include, but are not limited to:

- Ensuring clients have valid and certifiable proof of identification and proof of location compliance and disclosure documents.

- Maintaining accurate records of such information.
- Determining that clients are not known or suspected terrorists, money launderers, criminals, or PEPs, by checking their names against various international watch lists of known for such activities.
- Informing clients that the information they provide may be used to verify their identity.
- Closely following clients' money transactions for suspicious transactions and behavior.
- Not accepting cash, money orders, third party transactions, exchange houses transfers or Western Union transfers.
- Monitoring trade activity for suspicious or insider trading patterns.
- Directing fund withdrawals back to the original source of remittance, as a preventative measure.

International Anti-money Laundering requires financial services institutions to be aware of potential money laundering abuses that could occur in a customer account and implement a compliance program to deter, detect and report potential suspicious activity.

These guidelines have been successfully implemented to protect MT.COOK and their clients.

For questions/comments regarding these guidelines, contact MT.COOK at [compliance@mtcookfinancial.com](mailto:compliance@mtcookfinancial.com).