



## ANTI MONEY LAUNDERING POLICIES & PROCEDURES

Temperi Logistics Ltd. takes a zero-tolerance approach to being involved in illegal/illicit activity, and will fully comply with all relevant sections of the

- Bulgarian Anti-Money Laundering Act  
<https://lex.bg/bg/laws/ldoc/2137182924>
- Bulgarian Anti-Terrorist Financing Act  
<https://lex.bg/laws/ldoc/2135463446>

The purpose of AML is to provide due diligence measures when entering into and executing contracts.

These measures include:

1. Identifying customers and verifying their identity based on documents, data, or information obtained from reliable and independent sources;
2. Identifying the actual owner and taking appropriate measures to verify their identity in a manner that provides reasonable grounds to believe that the actual owner has been identified, including taking appropriate measures to clarify the customer's ownership and control structure;
3. Gathering information and assessing the purpose and nature of the business relationship established or to be established with the customer, in cases provided for by law;
4. Ascertaining the origin of funds;
5. Monitoring the established business relationship, scrutinizing and analyzing the transactions and operations carried out throughout



the relationship to establish whether they correspond to the risk profile and to keep and promptly update the relevant documents, data, and information.

These measures apply:

1. In case of cash payments in the equivalent of more than 5000 euros
2. For payments through banks in the equivalent of more than 15,000 euros
3. When transferring virtual assets in the equivalent of more than EUR 1,000
4. In any case of suspicion of money laundering, suspicion of terrorist financing, and/or presence of funds of criminal origin, regardless of the size of the transaction or transaction

All partners and employees of the firm are under an obligation and duty to comply with the above. This policy & any related procedures aims to help partners and staff fulfil these responsibilities, by providing a clear framework, along with setting out the firm's key principles and obligations.

- Failure to fulfil these responsibilities may result in disciplinary action and may also result in criminal sanctions for the staff involved.
- Breaches may also be reportable to our AML Supervisor which may result in professional disciplinary action.
- Furthermore, a report may also have to be made to the NCA or other law enforcement agencies, which may result in a criminal investigation.

Responsibilities under relevant legislation include:

- Risk Based Assessment
- Customer Due Diligence, including ID&V requirements, assessing Source of Wealth, and application of KYC information
- Enhanced Due Diligence & Ongoing Monitoring (incl. definition and treatment of PEPs)
- MLRO Responsibilities, SAR Reporting, Tipping Off, Police Orders



- Quality Assurance
- AML Record Keeping
- AML Training
- Compliance with International Sanctions Requirements

Key responsibilities of staff therefore include (but are not limited to):

- Conducting an adequate risk assessment and appropriate due diligence (CDD) on clients and transactions, including PEP and sanctions checking.
- Monitoring all clients/transactions on an ongoing basis for potential money laundering or terrorist financing activity;
- Reporting any suspicious activity in respect of client or transactions to the MLRO in accordance with the firms SAR (suspicious activity reporting) procedure;
- Avoiding discussing any potential or actual SARs with clients or any third parties ("Tipping off")
- Referring any Police/Law Enforcement queries or requests to the MLRO;
- Undertaking any AML-related training provided by the Firm.
- Keeping appropriate records of all AML related activity

**Details the Entity's assessment of its risk profile based on the key factors.**

The partner(s) believe Temperi Logistics Ltd. are at a high/medium/low risk of being used to launder the proceeds of crime. This is based on the following factors:

- Types of Work undertaken – regulated/non-regulated. Mostly Conveyancing? Litigation? Wills/Executor? Tax Advisor etc.
- High turnover of clients or a stable existing client base?
- High proportion of one-off clients/deals?
- Mostly F2F or non-F2F contact with clients?
- Geographical location of practice – high levels of crime?
- Act for clients across both criminal and civil matters
- International element of the business



- Company Capital Owner undertakes AML policy and approves all deals according this AML
- Deals with sanctioned countries, companies and personalities are prohibited
- Client's compliance to be executed before the contract conclusion
- Additional compliance to be done at ownership or/and director's change

### **Politically exposed persons (PEPs)**

The firm will apply enhanced and ongoing due diligence to all PEP clients and will consider and assess the heightened risk of undertaking business with or on behalf of PEPs, particularly the risk of laundering the proceeds of corruption.

What is a PEP?

- A "politically exposed person" (PEP) is a term describing someone who has been entrusted with a prominent public function.
- A PEP generally presents a higher risk for potential involvement in bribery and corruption by virtue of their position and the influence that they may hold. Positions may include:
  - Head of state, heads of government, ministers and deputy or assistant ministers
  - Members of parliament
  - Members of supreme courts, of constitutional courts, or of other high-level judicial bodies – members of courts of auditors or of the boards of central banks
  - Ambassadors, charges d'affairs and high-ranking officers in the armed forces
  - Members of the administrative, management or supervisory bodies of state-owned enterprises

The definition of a PEP also extends to:

- family members of a PEP – spouse, partner, children and their spouses or partners, and parents
- known close associates of a PEP – persons with whom joint beneficial ownership of a legal entity or legal arrangement is held, with whom there are close business relationships, or who is a sole beneficial owner of a legal entity or arrangement set up by the primary PEP

If the firm deploys an electronic verification tool – this tool should be used to check potential PEP status on all clients



(If electronic verification is not deployed): Should circumstances or information arise to suggest that a client is a PEP (or a corporate client is owned/controlled by a PEP) the firm should ask the client additional questions to determine PEP status, and use open-source information to verify.

**Criteria of suspicious operations, transactions and contractual details:**

- Use of corporate vehicles (i.e., legal entities, such as shell companies, and legal arrangements) to obscure (i) ownership, (ii) source of funds, or (iii) countries involved, particularly sanctioned jurisdictions;
- A customer's reluctance to share information about the end use of a product, including reluctance to complete an end-user form;
- Use of shell companies to conduct international wire transfers, often involving financial institutions in jurisdictions distinct from company registration;
- Declining customary installation, training, or maintenance of the purchased item(s);
- IP addresses that do not correspond to a customer's reported location data;
- Last-minute changes to shipping instructions that appear contrary to customer history or business practices;
- Payment coming from a third-party country or business not listed on the End-User Statement<sup>3</sup> or another applicable end-user form;
- Use of personal email accounts instead of company email addresses;
- Operation of complex and/or international businesses using residential addresses or addresses common to multiple closely-held corporate entities;
- Changes to standard letters of engagement that obscure the ultimate customer;
- Transactions involving a change in shipments or payments that were previously scheduled for Russia or Belarus;
- Transactions involving entities with little or no web presence; or
- Routing purchases through certain transshipment points commonly used to illegally redirect restricted items to Russia or Belarus. Such locations may include China (including Hong Kong and Macau) and jurisdictions close to Russia, including Armenia, Turkey, and Uzbekistan.



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- Transactions with Ukraine to be oriented on Glossary on Prevention and Counteraction to Legalization (Laundering) of Criminal Proceeds, Terrorist Financing, Financing of Proliferation of Weapons of Mass Destruction and Corruption

<https://www.osce.org/project-coordinator-in-ukraine/410911>



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**STATEMENT BY ULTIMATE CONSIGNEE AND PURCHASER**

FORM <b>BIS-711</b> FORM APPROVED UNDER OMB CONTROL NO. 0694-0021	U.S. DEPARTMENT OF COMMERCE BUREAU OF INDUSTRY AND SECURITY <small>Information furnished herewith is subject to the provisions of the Sections 4812(b)(7) and 4814(b)(1)(B) of the Export Control Reform Act (ECRA) and its unauthorized disclosure is prohibited by law.</small>	DATE RECEIVED (Leave Blank)
<b>STATEMENT BY ULTIMATE CONSIGNEE AND PURCHASER</b>		
1. ULTIMATE CONSIGNEE	CITY	
ADDRESS LINE 1	COUNTRY	
ADDRESS LINE 2	POSTAL CODE	TELEPHONE OR FAX
<b>2. DISPOSITION OR USE OF ITEMS BY ULTIMATE CONSIGNEE NAMED IN BLOCK 1</b> We certify that the items: <i>(left mouse click in the appropriate box below)</i>		
A. <input type="checkbox"/> Will be used by us (as capital equipment) in the form in which received in a manufacturing process in the country named in Block 1 and will not be reexported or incorporated into an end product.		
B. <input type="checkbox"/> Will be processed or incorporated by us into the following product (s) to be manufactured in the country named in Block 1 for distribution in _____		
C. <input type="checkbox"/> Will be resold by us in the form in which received in the country named in Block 1 for use or consumption therein. The specific end-use by my customer will be _____		
D. <input type="checkbox"/> Will be reexported by us in the form in which received to _____		
E. <input type="checkbox"/> Other (describe fully) _____		
<small>NOTE: If BOX (D) is checked, acceptance of this form by the Bureau of Industry and Security as a supporting document for license applications shall not be construed as an authorization to reexport the items to which the form applies unless specific approval has been obtained from the Bureau of Industry and Security for such export.</small>		
<b>3. NATURE OF BUSINESS OF ULTIMATE CONSIGNEE NAMED IN BLOCK 1</b>		
A. The nature of our usual business is _____		
B. Our business relationship with the U.S. exporter is and we have had this business relationship for year(s).		
<b>4. ADDITIONAL INFORMATION</b>		



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<b>5. ASSISTANCE IN PREPARING STATEMENT</b>		
<b>STATEMENT OF ULTIMATE CONSIGNEE AND PURCHASER</b> We certify that all of the facts contained in this statement are true and correct to the best of our knowledge and we do not know of any additional facts which are inconsistent with the above statement. We shall promptly send a supplemental statement to the U.S. Exporter, disclosing any change of facts or intentions set forth in this statement which occurs after the statement has been prepared and forwarded, except as specifically authorized by the U.S. Export Administration Regulations (15 CFR parts 730-774), or by prior written approval of the Bureau of Industry and Security, we will not reexport, resell, or otherwise dispose of any items approved on a license supported by this statement (1) to any country not approved for export as brought to our attention by means of a bill of lading, commercial invoice, or any other means, or(2) to any person if we know that it will result directly or indirectly, in disposition of the items contrary to the representations made in this statement or contrary to Export Administration Regulations.		
<b>6. SIGNATURE OF OFFICIAL OF ULTIMATE CONSIGNEE</b>		<b>7. NAME OF PURCHASER</b>
NAME OF OFFICIAL		SIGNATURE OF PURCHASER
TITLE OF OFFICIAL		NAME OF OFFICIAL
DATE (mm/dd/yyyy)		TITLE OF OFFICIAL
CERTIFICATION FOR USE OF U.S. EXPORTER - We certify that no corrections, additions, or alterations were made on this form by us after the form was signed by the (ultimate consignee)(purchaser).		DATE (mm/dd/yyyy)
<b>8. NAME OF EXPORTER</b>		SIGNATURE OF PERSON AUTHORIZED TO CERTIFY FOR EXPORTER
NAME OF PERSON SIGNING THIS DOCUMENT		TITLE OF PERSON SIGNING THIS DOCUMENT
		DATE (mm/dd/yyyy)
We acknowledge that the making of any false statements or concealment of any material fact in connection with this statement may result in imprisonment or fine, or both and denial, in whole or in part, of participation in U.S. exports and reexports.		
Public reporting burden for this collection of information is estimated to average 15 minutes per Reduction Project (0694-0021), Washington, D.C. 20503. Notwithstanding any other provision of law, no response plus one minute for recordkeeping, including the time for reviewing instruments, searching person is obligated to respond to nor shall a person be subject to a penalty for failure to comply with a existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information subject to the Paperwork Reduction Act unless that collection of information collection of information. Send comments regarding this burden estimate or any other aspect of this displays a currently valid OMB Control Number. collection of information, including suggestions for reducing this burden, to the U.S. Department of Commerce, Washington, DC 20230, and to the Office of Management and Budget Paperwork		





### International Sanctions Checking:

The fee earner will conduct a sanctions list check on each new client via

<https://www.sanctionsmap.eu/#/main>

## QUESTIONNAIRE FORM

**In order to assess your facility, we kindly request you to complete the following questionnaire, preferably using the Word document as it is. After completion and signature, please send it back to us by e-mail.**

1. Company details		
1	<b>Full style name</b> Registration number	
2	VAT/ Tax No.	
3	<b>Registration address</b>  Mailing address	
4	Tel	
5	Email	
6	Website	
7	Contact person(s) Position Contact phone and E-mail	



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<b>8</b>	<b>Is company member of a Group? Which?</b>	
<b>9</b>	Shareholders' equity	
<b>10</b>	<b>Company shareholders</b> (share 25% ownership or more) Full name Date of birth (Incorporation) Country of Residence (Incorporation) Passport No, date of expiry Affiliated companies	
<b>11</b>	<b>CEO/ Director</b> Full name Date of birth Country of Residence Passport No, date of expiry Affiliated companies	
<b>12</b>	<b>Who is authorized to issue invoices?</b> First name, last name <b>specimen signature</b>	
<b>13</b>	<b>When was the company founded?</b>	
<b>14</b>	<b>Number of employees</b> Staff Outsourcing and Outstaffing	
<b>15</b>	<b>Annual production</b> Product stocks	



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<b>16</b>	<b>Storage facility</b> Address	
<b>17</b>	Number of years in Business	
<b>18</b>	Is company ISO certified, advise reference number	
<b>19</b>	Other Licenses or certifications	
<b>20</b>	<b>Primary Business Activity:</b>	
<b>21</b>	<b>Commodities &amp; annual turnover in USD and tonnage:</b>	
<b>22</b>	<b>Please advise at least 3 main customers including contact details:</b>	
<b>23</b>	<b>Description of Company activity:</b>	

## 2. Bank information

<b>24</b>	<b>Please advise your bank details</b>	
<b>A</b>	Bank name and address	
<b>C</b>	IBAN	<b>Name Bank</b> IBAN: IBAN: <b>Name Bank</b>



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		IBAN: IBAN: <b>Name Bank</b> IBAN: IBAN:
<b>D</b>	SWIFT	<b>Name Bank:</b> <b>Name Bank:</b> <b>Name Bank:</b>
<b>25</b>	Please advise banks, which accepted receipts issued by your company in the past	

### 3. Other information

<b>26</b>	Mentions about the company in the news	
<b>27</b>	Social media company	
<b>28</b>	Is company member in any organization? Which?	
<b>29</b>	<b>Litigation history</b> won cases, number and volume bad cases, quantity and volume	



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**4. Financial indicators, for the last three years, USD or EUR**

<b>30</b>	<b>Income statement, EUR</b>	Y2021	Y2022	Y2023
	Income			
	COGS			
	Income before Taxes			
	Net Profit (Loss)			
<b>31</b>	<b>Balance statement, EUR</b>			
	Assets			
	Non-current assets			
	Goods			
	Debtors			
	Cash			
	Liability & Equity			
	Capital			
	Retained earnings			
	Accounts payable			
	buyers			
	suppliers			
	employees			
	taxes			

**5. Documents**

**Please attach copies of following docs to this questionnaire**

I	Latest balance sheet, income and cash statement, audit report
II	Company registry
III	Confirmation letter of bank details from your bank
IV	Passport copy of company shareholders and other authorized signatures mentioned under point 12



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Questionnaire completed on: \_\_\_\_\_, **2024**

**Declaration**

**I/ we hereby confirm that the information and materials provided in this document as well as its attachments are accurate and up to date.**

.....  
(signature & stamp)

\_\_\_\_\_  
(name & title)

Company capital owner  
Borys Levit  
January, 1, 2024