Sanctions Screening Policy

Version	1.0
Effective Date	01 June 2025
Approved By	Compliance & Risk Committee
Next Review Date	01 June 2026

1. Purpose

The purpose of this policy is to ensure that Bayarcash Sdn. Bhd. (Registration Number: 202201040365 (1486062-H)) (**"Bayarcash"**) complies with all applicable sanctions and watchlist regulations by screening merchants, transactions, and business partners against relevant lists to prevent illicit activities.

2. Scope

This policy applies to:

- All merchants, counterparties, and business partners of Bayarcash.
- All transactions processed through Bayarcash systems.
- All Bayarcash employees responsible for onboarding, compliance, and transaction monitoring.

3. Policy Statement

Bayarcash is committed to:

- Screening all merchants and transactions against relevant sanctions lists (local, international, and regulatory).
- Preventing the facilitation of transactions involving sanctioned individuals, entities, or countries.
- Reporting any positive matches to the Compliance & Risk Team and relevant authorities as required by law.
- Maintaining audit trails of all screenings for regulatory and internal review.

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4. Screening Process

Bayarcash applies a robust sanctions screening framework to ensure merchants and transactions do not involve prohibited or high-risk parties, supporting compliance with regulatory and international requirements.

Activity	Description
Merchant Onboarding	Screen all new merchants against up-to-date sanctions and watchlists.
Ongoing Monitoring	Conduct periodic reviews and screening of existing merchants and transactions.
Transaction Screening	Automatically screen transactions in real-time against sanctions lists.
Alerts & Escalation	Any positive match or potential hit is escalated to the Compliance & Risk Team for review and further action.

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5. Roles & Responsibilities

Bayarcash assigns clear responsibilities across compliance, operations, and management to ensure effective sanctions screening and regulatory adherence.

Role	Responsibility
Compliance & Risk Team	Maintain sanctions lists, review alerts, and report to authorities.
Operations & Frontline Staff	Ensure merchant and transaction data is screened as part of onboarding and transaction processing.
Management	Provide oversight and ensure resources for effective sanctions screening.

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6. Record Keeping

All screening results, alerts, and actions taken must be securely stored and retained according to Bayarcash's **Record Retention Policy**.

7. Review of Policy

This policy will be reviewed at least annually or when regulatory requirements change to ensure ongoing compliance.