



Annex 1 to the ORDER of the Chief Executive Officer of the Astana Financial Services Authority (“AFSA”)

NOTICE AFSA-T-OA-2024-0037

To	Freedom Finance Global PLC (FFG)
Business identification number	200240900095
Regulated Activity	-Dealing in Investments as Principal -Dealing in Investments as Agent -Managing Investments -Managing a Collective Investment Scheme -Advising on Investments -Arranging Deals in Investments
The address of the Registered Office	010016, 16 Dostyk St, integral non-residential facility No.2, Astana, Kazakhstan

THE ASTANA FINANCIAL SERVICES AUTHORITY (AFSA) HEREBY GIVES NOTICE THAT:

Rule 6.2.3 (d) of the AIFC Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Rules (AML Rules), “Establishing a business relationship before Customer Due Diligence is complete” is modified to Freedom Finance Global PLC as specified in the right-hand column of Table A **under the certain conditions set by this written notice.**

TABLE A – RULES MODIFIED

The Rule specified in the left-hand column of the table below is modified to the extent shown in the right-hand column of the table below. In Table A, underlining indicates new text; otherwise, the Rule remains unaltered.

Table A. Modified AIFC Rule

AIFC Act	Modified Rule / Regulation
6.2.3 (d) of the AIFC AML Rules	<p>6.2.3. Establishing a business relationship before Customer Due Diligence is complete</p> <p>A Relevant Person may establish or retain a business relationship with a customer before completing the verification required by AML 6.3.1 if the following conditions are met:</p> <p>[...]</p> <p>(d) subject to (c), the relevant verification is completed as soon as reasonably practicable before or during the establishment of a business relationship and when transactions for occasional customers are being conducted; and in any event, no later than 120 days after the establishment of a business relationship.</p>



CONDITIONS

1. To provide an undertaking letter assuring that all new clients originating from Freedom Securities Trading Inc. incorporated in Belize will undergo Customer Due Diligence (CDD) procedures, with measures in place to minimise the risk of engaging with sanctioned individuals.
2. To adopt risk management procedures with respect to the conditions under which a customer may utilise the business relationship prior to verification, envisaged by Rule 6.2.3.
3. To split the CDD procedures into two stages: The first stage involves checking all customers against sanctions lists to prevent the establishment of relationships with sanctioned individuals or entities. Once the authorised firm has completed the first stage and received approval from the AFSA, the company may proceed with the next steps of CDD, albeit considering the risks associated with deferring customer verification, including limitations on transactions and close monitoring of activities.
4. To promptly terminate any business relationships with customers listed on the sanctioned lists of the United States, European Union, and United Kingdom. (OFAC, EU, HMT UK inclusive but not limited to).
- 5 To submit a monthly report to the AFSA (in addition to the register already required to be maintained) with a list of all relevant customers, originating from Freedom Securities Trading Inc. incorporated in Belize, whose business relationship has been terminated for whatever reasons, stating the reason for the termination of the relationship, the total balance of the client's account with FFG and the date that the client's relationship commenced with the Freedom Securities Trading Inc..

EFFECTIVE PERIOD

This notice comes into effect on the date of issue and remains effective until further Notice.

INTERPRETATION

Defined terms are identified in this notice by the capitalisation of the initial letter of a word or of each word in a phrase and are defined in the AIFC Glossary. Unless the context otherwise requires, where capitalisation of the initial letter is not used, an expression has its natural meaning.

THIS NOTICE IS ISSUED PURSUANT TO SECTION 9 OF THE FINANCIAL SERVICES FRAMEWORK REGULATIONS BY THE ASTANA FINANCIAL SERVICES AUTHORITY.