LE CHAO
TOURS AND TRAVELS LIMITED
Your Journey, Our Priority

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ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY

Internal policy · Version 1.0

Document owner

Money Laundering Reporting Officer

Issued by

Le Chao Tours and Travel Limited

Review

At least annually, and upon any material change in law or business

Office

Equatoria Shopping Mall, Kampala, Uganda

Classification

Internal — staff, agents and contractors

1. Purpose

This policy sets out the measures by which Le Chao Tours and Travel Limited prevents the business from being used for money laundering, terrorist financing or proliferation financing. It applies to package tours, ticketing, transfers, accommodation and activity bookings, group travel, and any receipt or payment of client funds.

The Company does not tolerate the use of its services for financial crime. No director, employee or agent may ignore, conceal or assist a transaction that they know or suspect involves the proceeds of crime or funds connected with terrorism.

2. Scope

This policy applies to:

- Directors, employees, agents, freelance guides contracted by the Company, and anyone who takes bookings or handles client money on the Company's behalf.
- All sales channels: office, telephone, email, website, and third-party agents.
- Customers who are individuals, companies, schools, churches, clubs, and corporate accounts.

Where a host airline, hotel, or payment provider imposes stricter checks, the stricter rule applies.

3. Legal framework

The Company complies with the Anti-Money Laundering Act, 2013, as amended, the Anti-Money Laundering Regulations, and any other applicable Ugandan law. Matters requiring external report are submitted to the Financial Intelligence Authority. Where a booking also involves another jurisdiction, the stricter applicable requirement is followed.

4. Governance

4.1 Senior management

Management is responsible for the operation of this policy, for designating the Money Laundering Reporting Officer,

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and for ensuring that staff have the means to apply it.

4.2 Money Laundering Reporting Officer

Internal reports are received at its.joel.ug@gmail.com, with a copy to info.lechaotours.ug@gmail.com. The Money Laundering Reporting Officer:

- Receives internal reports and determines whether a report to the Financial Intelligence Authority is required.
- Maintains this policy and the Company's risk assessment.
- Is the point of contact for banks, regulators and the Financial Intelligence Authority.
- Brings any material breach to the attention of management without delay.

A report may be made in person at Equatoria Shopping Mall, Kampala, by telephone on +256 701 429 900 or +256 702 536 211, or by confidential email.

4.3 Staff and agents

Every person who takes a booking or handles client funds shall complete the checks required by this policy, remain alert to the indicators in the Appendix, and report any suspicion only to the Money Laundering Reporting Officer. The customer shall not be informed that a report has been made or is under consideration.

5. Risk assessment

The Company will keep a written money-laundering and terrorist-financing risk assessment, reviewed at least yearly. The assessment covers customers, countries, products, and delivery channels. Travel-agency risks the Company treats as higher include:

- Large cash payments, or a series of cash payments that together are large.
- Payment by a third party who is not the traveller and has no clear link to the booking.
- Last-minute high-value bookings, especially one-way tickets or open tickets with no credible travel purpose.
- Customers or destinations linked to sanctioned countries, or customers who are politically exposed persons.
- Requests to overpay and receive the surplus as a refund to a different account or in cash.
- Bookings made through an intermediary who will not identify the actual travellers.

Controls in this policy are set to match that risk. Higher-risk bookings need enhanced due diligence before tickets are issued or funds are accepted.

6. Customer due diligence

6.1 When checks are required

The Company will identify and verify the customer before issuing tickets or taking payment where any of the following apply:

- The booking value, or linked bookings, meets or exceeds [insert threshold, for example the local currency equivalent of USD 1,000], or any cash is involved above [insert cash threshold].
- The customer is a company, school, NGO, or other organisation.
- A third party is paying.
- The booking is higher risk under section 5, or staff have any doubt about identity or purpose.

Walk-in cash sales below the threshold may proceed with the customer's name and a contact number, provided no red

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flag is present. Staff must still refuse the sale if something does not make sense.

6.2 Individual customers

Collect and keep a copy of: full name, date of birth, nationality, residential address, phone and email, and a government photo identity document (passport or national identity card). The name on the booking must match the travel document that will be used to fly.

6.3 Companies and groups

Collect: registered name, registration number, registered address, names of directors, and the identity of the person instructing the booking. For companies, identify beneficial owners who own or control 25 percent or more, or who otherwise control the entity. Obtain a letter or email of authority for the person placing the order.

6.4 Third-party payments

The Company does not accept payment from an unrelated third party unless the relationship is explained and documented (for example an employer, a parent, or a spouse) and the payer's identity is verified. Refunds go back to the original payer by the original method, not to a new account and not in cash, unless the MLRO approves an exception in writing.

6.5 Enhanced due diligence

Enhanced checks are mandatory for politically exposed persons, customers linked to higher-risk countries, unusually complex bookings, and any case the MLRO escalates. Enhanced checks include source of funds, senior-management approval before the booking is confirmed, and closer monitoring until travel is complete.

6.6 Sanctions

Before confirming a higher-risk booking, staff will screen the customer, payer, and traveller names against applicable sanctions lists (including United Nations lists and any list required in the country of operation). A match, or a near match that cannot be cleared, means the booking stops and the MLRO is told immediately. The Company will not deal with a sanctioned person or a sanctioned destination where the law forbids it.

7. Ongoing monitoring

Staff will compare each new booking with what is already known about the customer. Repeat changes of passenger names, repeated refunds, or payment patterns that do not match the stated travel purpose must be referred to the MLRO before tickets are issued.

8. Payments

Preferred methods are bank transfer, card payment, and reputable mobile-money services in the customer's own name. The Company will:

- Cash is not accepted above UGX 10,000,000 for a single booking, or for linked bookings within thirty days, unless management has approved the payment and the source of the funds has been recorded.
- Not accept cryptocurrency.
- Not split a payment across several receipts to stay under the cash limit.
- Issue a receipt for every payment, showing payer name, amount, method, booking reference, and date.

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9. Suspicious activity reporting

Suspicion does not require proof. Examples that must be reported internally include a customer who refuses to provide identity, gives documents that look false, offers a story that changes, pressures staff to skip checks, or asks for a refund to a different person after paying in cash.

The staff member reports the facts to the MLRO and does not discuss the report with the customer or with colleagues who do not need to know. The MLRO decides, without delay, whether the matter must be reported to the Financial Intelligence Authority. Where the law requires it, the Company will not proceed with the transaction until consent is received or the statutory period has passed. Records of the decision, including a decision not to report, are kept by the MLRO.

10. Record-keeping

The Company will keep customer identity records, booking files, payment evidence, screening results, and internal and external reports for at least five years after the end of the customer relationship or the date of the transaction, whichever is later, or longer if local law requires. Records are stored so they can be produced to a competent authority.

11. Training

All customer-facing staff and anyone who handles payments will be trained on this policy before they take bookings, and at least once a year after that. Training covers red flags for travel businesses, how to complete due diligence, how to report internally, and the offence of tipping off. Attendance is recorded.

12. Breaches

Failure to follow this policy may lead to disciplinary action, up to dismissal, and may be a criminal offence for the individual as well as for the Company. Staff who report a genuine suspicion in good faith will not be penalised for the report.

13. Review

The MLRO reviews this policy at least annually and after any material change in law, products, or risk. Changes are approved by senior management. The current version is the only version staff may use.

14. Enquiries

Enquiries concerning this policy may be directed to info.lechaotours.ug@gmail.com or its.joel.ug@gmail.com, or by telephone on +256 701 429 900 or +256 702 536 211.

Appendix — Indicators requiring referral

- Customer will not show a passport or gives a copy that looks altered.
- Traveller names are changed several times after payment.
- Cash payment just below the internal cash limit, repeated across bookings.
- Request to route a refund to a different person or country.
- Group booking where the organiser will not name the travellers.
- Customer is evasive about the purpose of travel or the source of a large payment.

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• The booking concerns a country subject to sanctions or a travel restriction.

