



**HARTLEY OILS**

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## **COMPLIANCE PACKAGE**

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### **REQUIRED INFORMATION AND DOCUMENTS LIST**

1. Client Information Sheet
2. Applicant's Passport
3. Company registration documents

### **CLIENT INFORMATION SHEET**

In accordance with all applicable laws and rules concerning the prevention of money laundering, the following information may be supplied to banks and/or other financial companies for the purpose of verification of identity. All parties have an obligation to respect professional secrecy and to take all appropriate precautions to protect the confidentiality of the information each holds in respect of the other's activities. This legal obligation shall always remain in full force and effect.



# COMPANY REGISTRATION INFORMATION

<b>Full Legal Name of Company</b>	
<b>Corporate Trade Name, if any</b>	
<b>Describe the Company's Core Business Activities</b>	
<b>Registered Business Address</b>	
<b>Type of Entity (Corporation, LLC, etc.)</b>	
<b>Country/State of Incorporation</b>	
<b>Date of Incorporation/Formation</b>	
<b>Company Registration Number</b>	
<b>Tax Registration Number</b>	
<b>Company Telephone Number</b>	
<b>Company E-Mail</b>	
<b>Company Website URL</b>	
<b>Indicate the Countries where the Company operates</b>	
<b>Does the Company operate in any sanctioned Country? If so, please provide details</b>	



# COMPANY OFFICER/LEGAL REPRESENTATIVE INFORMATION

Full Name	
Passport Number	
Passport Issue / (Date/Place)	
Passport Expiry Date	
Birth Date	
Email	
Mobile Phone Number	

## COMPANY BANKING INFORMATION

Bank's Name	
Address	
Swift Code	
IBAN Number	
Account Name	
Account Number (Last 4 Digits)	
Authorized Signatory	

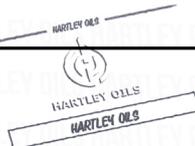


## TRANSACTION DETAILS

Is the Company the Exit Buyer? If not, please explain	
Is the Company a Proxy Buyer? If so, when will the "real" Buyer step in?	
Is the Company purchasing for a Governmental Agency?	
Is the Company using someone else's funds for payment via MT103/TT?	
Does the Company own vessels? If yes, provide details.	
Does the Company own/lease storage tanks? If yes, provide details.	

## ANTI-MONEY LAUNDERING (AML) & FINANCING TERRORISM CONTROLS (FTC)

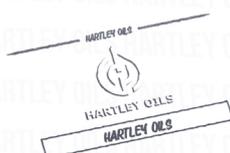
<b>GENERAL AML POLICIES, PRACTICES, AND PROCEDURES</b>	<b>YES</b>	<b>NO</b>
Are there laws in the country of incorporation of your company designed to prevent and dealwith money laundering and terrorist financing?		
Has your company developed written policies and procedures to prevent, detect and report suspicious transactions/terrorist financing activities?		
Does your AML/FTC policy meet the requirements of local and national laws?		
Is your AML/FTC policy approved by your company's board or by a senior committee?		
Does your AML/FTC policy require you to identify the source of your customers' funds or income?		
Besides inspections by the government supervisors/regulators, does your company have an internal audit function or another independent third party that assesses AML/FTC policies and practices regularly?		
Does your company have policies to prohibit any accounts/relationships with shell banks (a financial institution that lacks a physical presence in the country where it is incorporated and/or has no employees, offices or assets in that country and is often used to facilitate international financial transactions)?		
Does your company offer anonymous accounts (accounts where Identification is not reviewed prior to opening)?		
Does your company have appropriate record retention procedures pursuant to applicable laws?		



<b>KNOW YOUR CUSTOMER, DUE DILIGENCE AND ENHANCED DUE DILIGENCE</b>	<b>YES</b>	<b>NO</b>
Does your company require the verification of identification information for all customers and counterparties (individuals or entities) at the establishment of the relationship?		
Does your company have procedures to establish a record for each new customer that contains their respective identification documents and 'Know Your Customer' information?		
Does your customer identification program require that enhanced due diligence be conducted regarding certain customers that may present a heightened level of money laundering and terrorist financing risk to your company, such as international private banking and correspondent banking customers, or customers from high-risk money laundering and terrorist financing jurisdictions?		

<b>REPORTABLE TRANSACTIONS AND PREVENTION AND DETECTION OF TRANSACTIONS WITH ILLEGALLY OBTAINED FUNDS</b>	<b>YES</b>	<b>NO</b>
Does your company have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?		
Does your company have procedures to identify transactions structured to avoid large cash reporting requirements?		
Does your company have policies to reasonably ensure that it only operates with Correspondent banks that possess licenses to operate in their countries of origin?		

**HARTLEY OILS**



# DECLARATION

The undersigned acting as a duly authorized representative of the Company hereby agrees, declares, and certifies that (and undertakes, where applicable):

- the information submitted herein is correct, accurate, comprehensive and not misleading and I do not know of any additional facts which are inconsistent with the aforementioned information;
- to the best of his/her knowledge or belief neither the Company, nor any person or entity that owns or controls the Company (whether directly or indirectly), nor any subsidiary, employee, representative or agent of the Company, or that the Company cooperates or affiliates itself with, is: (a) subject to any sanctions imposed upon them by any recognized international or applicable local authority including but not limited to the European Union, the United Nations, the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) or the Bureau of Industry and Security (BIS) of the United States Department of Commerce;
- he/she understands that any transaction not in compliance with the applicable boycott, anti money laundering, anti-terrorism, anti-drug trafficking and economic sanctions laws and regulations is not acceptable to Hartley Oils, and that Hartley Oils does not accept payment involving any sanctioned countries and will not conduct any business which is contrary to Hartley Oils's policy;
- he/she does not and will not have any dealings or transactions with any sanctioned countries such as Sudan, Iran, Syria, Cuba, North Korea, Crimea, Russia and any other sanctioned countries as updated from time to time by the relevant authorities;
- to the best of his/her knowledge, the company's funds and assets are good, clean, clear, and of non-criminal origin; that said funds and assets have been earned in the course of regular commercial business and are of commercial origin and legally generated; and that said funds and assets are not in breach of any Money Laundering Regulation howsoever interpreted, defined, revised or amended whether within the host state of the transaction or internationally;
- he/she understands that in the event any party, entity, individual involved or part of any transaction with Hartley Oils is in breach or subsequently breaches any applicable boycott, anti-money laundering, anti-terrorism or anti-drug trafficking laws and regulations then in force in the United States, the United Nations, and/or the Council of the European Union and/or is, or becomes subject to any sanctions then created and maintained by any



competent authority of the United States Department of the Treasury's Office of Foreign Assets Control, the Security Council of the United Nations (by way of resolution) and/or the Council of the European Union, Hartley Oils shall have no obligation to process and complete the transaction and shall be entitled to delay, freeze, refuse or cancel the payment obligation accordingly.

**Sincerely,**

**COMPANY NAME** \_\_\_\_\_

**ADDRESS** \_\_\_\_\_

**TELEPHONE** \_\_\_\_\_

**EMAIL** \_\_\_\_\_

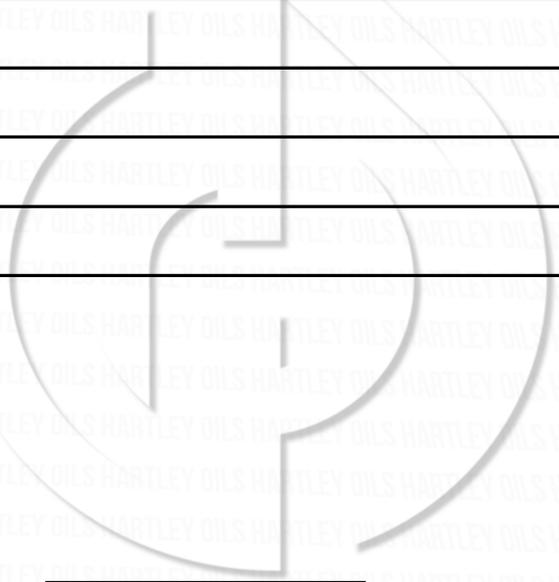
**REPRESENTATIVE** \_\_\_\_\_

**TITLE** \_\_\_\_\_

**PASSPORT NO** \_\_\_\_\_

**TELEPHONE** \_\_\_\_\_

**EMAIL** \_\_\_\_\_



**SIGNATURE**

**DATE**

**COMPANY STAMP/SEAL**

**HARTLEY OILS**

**PLEASE ENCLOSE SIGNATORY'S PASSPORT COPY AND COMPANY REGISTRATION WITH THIS DOCUMENT**

**END OF DOCUMENT.**

