

# LEMAN NIET-ARAKET

## An Overview of Compliance Standards of Leman Niet-Araket

### Leman Niet-Araket, LLC:

- ◆ Established in 1994; the oldest brokerage in the Kyrgyz Republic
- ◆ Owned 75% by a regulated Swiss asset manager, Leman Services et Investissements SA (est. 2002) and 25% by Emil Sultanbaev, a Kyrgyz businessman of high reputation with background in mining, retail finance and startup development
- ◆ FATCA GIIN: 99JT7I.99999.SL.417
- ◆ LEI 2534008511U45NWH4F58
- ◆ Licensed by the local investment market regulator as a broker, dealer and investment manager
- ◆ Member of the Kyrgyz Stock Exchange
- ◆ Member of the International Commodity Exchange (Bishkek).

### Compliance Standards Highlights:

- ◆ National AML standards in Kyrgyzstan follow the FATF 40 Recommendations; the law has been recently updated to include the latest developments in AML standards which comprehensively cover the non-banking financial sector;
- ◆ The company is subject to AML supervision by the national investment market regulator - the Financial Markets Regulation and Supervision Service of the Kyrgyz Republic;
- ◆ The company is a reporting entity and is accredited with the national FIU - the Financial Intelligence Service of the Kyrgyz Republic;
- ◆ The company's Internal AML and Risk Mitigation Rules (registered with the FIU) include standards derived from the EU IV AML Directive, latest edition of FATF 40 Recommendations (which include regulation of digital assets) insofar as they provide stricter regulation than the national standards;
- ◆ The company's risk policies do not allow onboarding clients resident in countries which are black- or grey-listed by the FATF;
- ◆ The company's policy is to do no business with clients on the sanctions lists of the UN, US, EU and UK;
- ◆ The company has efficient sanction-screening procedures for new and existing clients;
- ◆ The company screens client activity against the US sectoral sanctions (Eg. will not allow buying debt of Russian entities whose long-term borrowing is sanction-restricted);
- ◆ Significant accounts undergo an additional reputation check;
- ◆ The company has a "de-risking" attitude towards PEPs and currently has no PEP or PEP affiliated clients.