REGISTRATION AUTHORITY

MONETARY PENALTY NOTICE ISSUED PURSUANT TO SECTION 18(2)

OF THE

BENEFICIAL OWNERSHIP AND CONTROL REGULATIONS 2022

To: MIND TECH LTD (9116)

1. Issue of Monetary Penalty Notice

1.1 This Monetary Penalty Notice ("Notice") is issued pursuant to section 18(2) of the Beneficial Ownership and Control Regulations 2022 ("BOCR 2022").

1.2 The Registration Authority ("RA") of Abu Dhabi Global Market ("ADGM") has deemed MIND TECH LTD to have committed the contravention set out in section 16(1) of the BOCR 2022 for failure to comply with section 13 for the reasons set out below.

2. Failure to Comply with Section 13 of BOCR 2022

2.1 Section 13(1) of BOCR 2022 states as follows:

> "*The Registrar may, by notice in writing served on an ADGM Person (or its officers or directors), require them to submit to the Registrar in such form and manner, at such times or intervals, at such place and in respect of such periods as may be specified in the notice, with such information as the Registrar may reasonably require for the performance of his functions under these Regulations."*

2.2 As defined in section 26(1)(a) of BOCR 2022, an "ADGM Person" includes a company incorporated under Companies Regulations 2020. MIND TECH LTD is therefore deemed an ADGM Person and is required to submit to the Registrar its record of beneficial owners.

2.3 The RA first notified MIND TECH LTD on 26 July 2024 and subsequently on 9 August 2024 ("Notices") to file its record of beneficial ownership on the RA's Online Registry Portal ("ORS").

2.4 On 13 September 2024, the RA sent a further notice to MIND TECH LTD to file its record of beneficial ownership. As of the date of this Notice, MIND TECH LTD has failed to submit its record of beneficial ownership through the ORS.

3. Fine

3.1 Section 16(1) of BOCR 2022 states as follows:

"An ADGM Person who fails to comply with these Regulations or any rules made under these Regulations commits a contravention and shall be liable to a fine as prescribed under section 18."

3.2 Under section 18(4) of BOCR 2022, the amount of any fine determined by the RA issued in respect of a contravention of BOCR 2022 must not exceed a level 7 fine (as specified under the Commercial Licensing Regulations 2015 (Fines) Rules 2020), i.e., up to USD 25,000.

3.3 Given the facts set out above in paragraphs 2.3 to 2.5 (inclusive), the RA considers that MIND TECH LTD has failed to comply with section 13 of BOCR 2022 and has therefore committed a contravention of BOCR 2022.

3.4 Accordingly, pursuant to section 18(2) of BOCR 2022, the RA is issuing the following fine to MIND TECH LTD, which must be paid to the RA by no later than 5:00pm on 5 December 2024:

USD 1,000.

4. Procedural Matters

4.1 In accordance with section 18(7) of BOCR 2022, MIND TECH LTD may make representations to the Registrar in respect of this Notice within the time period specified below. Such representations must be made in writing to the following address:

The Registrar
ADGM Registration Authority
PO Box 111999
Abu Dhabi
UNITED ARAB EMIRATES

or emailed to Ra.enforcement@adgm.com and marked for the attention of the Registrar.

4.2 Any representations made in relation to this Notice must be received by the Registrar in writing by no later than 5:00pm on 5 December 2024.

4.3 In the event that MIND TECH LTD requires an extension of the time period set out in paragraph 4.2 in which to make representations to the Registrar, an extension request should be made within seven days of the Notice being given. The extension request must be made to the Registrar in writing on or before 5:00pm on 5 December 2024 and shall include a summary of the reason(s) why an extension is required. If the Registrar grants an extension, it may further extend the period in which the fine must be paid as set out in paragraph 3.4 above.

4.4 After considering any representations from MIND TECH LTD, the Registrar must then decide to either confirm the fine amount as stated in this Notice, vary the fine amount or discontinue the action in this Notice. The Registrar shall notify MIND TECH LTD of its decision within a reasonable time from the date of having received the representations.

4.5 In the event that any part of the fine remains outstanding on the date by which it must be paid, the obligation to make the payment is enforceable as a debt by the Registrar.

4.6 In accordance with section 18(13) of BOCR 2022, the Registrar may publish such information about the matter to which this Notice relates as it considers appropriate.

4.7 Notwithstanding the above, MIND TECH LTD may refer the matter to the ADGM Court for review in accordance with the Court Procedures Rules.

Tim Land

Delegate of the Registrar

21 November 2024

Abu Dhabi Global Market Registration Authority