

## **ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY**

### **1. Purpose and Scope**

This policy sets out the framework adopted by AJW to ensure compliance with its legal obligations and to prevent its business being used for money laundering or terrorist financing. The Company is not a regulated person under the Money Laundering Regulations but is subject to the Terrorism Act 2000 and Proceeds of Crime Act 2002. This policy applies to all directors, employees, and contractors.

### **2. What is money laundering and terrorist financing?**

Money laundering is the process through which proceeds of crime and their true origin and ownership are changed so that the proceeds appear legitimate. Terrorist financing is providing or collecting funds, from legitimate or illegitimate sources, to be used to carry out an act of terrorism.

### **3. Legal and Regulatory Context**

AJW recognises its obligations under UK law, including offences relating to terrorist property, funding arrangements, and disclosure obligations. Directors and senior management may face personal liability.

### **4. Risk Based Approach**

AJW adopts a risk-based approach considering customers, jurisdictions, payment methods, intermediaries and transaction complexity. Higher risk areas are subject to enhanced scrutiny.

### **5. Governance and Responsibility**

The Board retains ultimate responsibility. The General Counsel and Chief Financial Officer are appointed to oversee AML/CTF compliance and report material issues.

### **6. Counterparty due diligence**

Proportionate due diligence is conducted on customers, suppliers, and counterparties, including verification, ownership identification, sanctions screening, and understanding the business rationale.

### **7. Sanctions and Proscribed Organisations**

AJW does not engage with designated individuals or proscribed organisations. Screening is performed at onboarding and on an ongoing basis.

### **8. Transaction Monitoring**

Commercial oversight is maintained to identify unusual or inconsistent transactions, which are escalated where appropriate.

## **9. Reporting and escalation**

All staff must report suspicions to the General Counsel and Chief Financial Officer. Voluntary disclosures to authorities will be made where necessary.

## **10. Record Keeping**

Records of due diligence and risk assessments are retained for at least five years.

## **11. Training and awareness**

Relevant employees receive AML/CTF awareness training at onboarding stage and all relevant employees receive periodic refreshers.

## **12. Policy Review and Assurance**

The policy is reviewed annually and after material changes. Weaknesses are reported to the Board.

## **13. Non-Compliance**

Breaches may result in disciplinary action or reporting to authorities.

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