

## **ANTI-MONEY LAUNDERING (AML) POLICY**

### **NET ALL INTERNATIONAL LTD**

Registered Address: 32 Leonard Street, London, United Kingdom, EC2A 4LX

Business Activity: Financial Management Services

#### **1. Introduction**

NET ALL INTERNATIONAL LTD ("the Company") is committed to preventing money laundering, terrorist financing, and financial crime. This AML Policy establishes controls to ensure compliance with UK laws and international standards.

#### **2. Purpose**

The purpose of this policy is to protect the Company from being used for illicit financial activities and to ensure regulatory compliance, transparency, and ethical conduct.

#### **3. Scope and Applicability**

This policy applies to all directors, officers, employees, contractors, and clients of the Company and covers all services and transactions conducted by NET ALL INTERNATIONAL LTD.

#### **4. Legal and Regulatory Framework**

The Company complies with the UK Money Laundering Regulations 2017, Proceeds of Crime Act 2002, Terrorism Act 2000, and relevant FCA guidance where applicable.

#### **5. Risk-Based Approach**

The Company applies a risk-based approach to identify, assess, and mitigate AML risks based on customer type, geography, transaction size, and service nature.

#### **6. Customer Due Diligence (CDD)**

The Company verifies customer identity, understands the purpose of the business relationship, and assesses source of funds before onboarding clients.

#### **7. Enhanced Due Diligence (EDD)**

EDD is applied to high-risk customers including PEPs, high-risk jurisdictions, and complex transactions, requiring additional verification and monitoring.

#### **8. Ongoing Monitoring**

Customer relationships are monitored continuously to detect unusual or suspicious activities and ensure consistency with known customer profiles.

#### **9. PEPs and Sanctions Screening**

Customers are screened against sanctions lists and PEP databases. Higher scrutiny is applied where applicable.

#### **10. Suspicious Activity Reporting**

All suspicious activity must be reported internally and, where required, disclosed to the relevant authorities via SARs.

#### **11. Record Keeping**

Records of identification, transactions, and reports are retained for at least five (5) years in accordance with legal requirements.

#### **12. Training and Awareness**

Employees receive AML training to understand obligations, identify risks, and report concerns appropriately.

#### **13. Data Protection and Confidentiality**

All personal data is processed in compliance with the UK Data Protection Act 2018 and UK GDPR standards.

**14. Internal Controls and Governance**

The Company maintains internal controls, segregation of duties, and monitoring to ensure AML effectiveness.

**15. Review and Updates**

This policy is reviewed periodically and updated to reflect regulatory or operational changes.

**16. Zero-Tolerance Policy**

NET ALL INTERNATIONAL LTD maintains a zero-tolerance stance toward money laundering, terrorist financing, and financial crime.

**17. Whistleblowing and Internal Reporting**

The Company encourages confidential reporting of AML concerns and protects whistleblowers acting in good faith.

**18. Third-Party Relationships and Outsourcing**

Third parties are subject to due diligence and must maintain AML standards equivalent to those of the Company.

This AML Policy is mandatory and binding on all persons associated with NET ALL INTERNATIONAL LTD.