

ANTI-MONEY LAUNDERING (AML) POLICY
AL HAQ CONSULTANTS LTD
United Kingdom

1. Policy Statement

AL HAQ CONSULTANTS LTD is committed to preventing money laundering, terrorist financing, fraud, and financial crime. The Company applies strict compliance standards across all consulting and advisory services.

2. Purpose

This policy establishes controls to ensure compliance with UK AML laws and to safeguard the Company from misuse of its services.

3. Scope

This policy applies to all directors, employees, consultants, contractors, and clients of the Company.

4. Regulatory Framework

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

5. Risk-Based Approach

AML risks are assessed based on client profile, jurisdiction, service nature, and business structure complexity.

6. Client Due Diligence (CDD)

Client identity and engagement purpose are verified prior to establishing a business relationship.

7. Enhanced Due Diligence (EDD)

EDD applies to high-risk clients, including PEPs and clients from high-risk jurisdictions.

8. Ongoing Monitoring

Client engagements are monitored to ensure consistency with agreed purposes and risk profiles.

9. Sanctions and PEP Screening

Clients are screened against sanctions and PEP databases, with enhanced controls applied where required.

10. Suspicious Activity Reporting

Suspicious activities are reported internally and externally where legally required.

11. Record Keeping

AML records are retained for a minimum of five (5) years.

12. Training and Awareness

Relevant personnel receive regular AML training appropriate to their role.

13. Confidentiality and Data Protection

All AML data is processed in accordance with UK GDPR and data protection laws.

14. Governance and Internal Controls

The Company maintains effective internal controls and compliance oversight mechanisms.

15. Policy Review

This policy is reviewed periodically and updated as required.

16. Zero-Tolerance Enforcement

Any violation of this policy may result in termination of services or contractual relationships.

17. Advisory Services Risk Limitation Clause

The Company will not provide advisory services intended to conceal ownership, misrepresent activities, or evade regulatory oversight.

18. Client Acceptance and Refusal Rights (Additional Clause)

AL HAQ CONSULTANTS LTD reserves the right to refuse or discontinue services where clients fail to provide adequate information or where AML risks cannot be mitigated to an acceptable level.

19. Remote Engagement and Online Services Clause (Additional Clause)

Where services are delivered remotely or online, the Company applies enhanced verification and monitoring procedures to mitigate impersonation, identity fraud, and cross-border AML risks.

This AML Policy is binding on all persons associated with AL HAQ CONSULTANTS LTD and forms part of the Company's compliance framework.