

ANTI-MONEY LAUNDERING POLICY KOGWENO & BUBI CONSULTANTS LTD

1. Purpose

Kogweno & Bubi Consultants Ltd is committed to conducting business with integrity, transparency, and in full compliance with applicable anti-money laundering (“AML”) laws and regulations in the United Kingdom and other relevant jurisdictions. This Anti-Money Laundering Policy (“Policy”) establishes the principles, procedures, and controls implemented by the Company to prevent money laundering, terrorist financing, fraud, bribery, corruption, and other financial crimes in connection with its operations and services.

2. Legislative Framework

This Policy is guided by and shall be interpreted in accordance with applicable legislation and regulatory guidance, including but not limited to:

- Proceeds of Crime Act 2002
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Bribery Act 2010
- Relevant guidance issued by the UK Financial Conduct Authority, Serious Fraud Office, and other competent authorities.

3. Scope

This Policy applies to:

- Directors;
- Employees;
- Consultants;
- Contractors;
- Agents;
- Representatives; and
- Any third parties acting on behalf of the Company.

The Policy applies to all business activities conducted by the Company, including cross-border advisory services, consultancy engagements, business transactions, and client onboarding activities.

4. Policy Statement

The Company adopts a zero-tolerance approach to money laundering, terrorist financing, bribery, corruption, and other unlawful financial activities.

The Company shall:

- Conduct business only with legitimate clients and business partners;
- Implement appropriate client due diligence procedures;
- Maintain accurate and transparent records;
- Monitor transactions and engagements for suspicious activity;
- Report suspicious conduct where legally required; and
- Maintain internal controls designed to mitigate financial crime risks.

5. Risk-Based Approach

The Company applies a proportionate and risk-based approach to AML compliance. Risk assessments may consider:

- Client identity and background;
- Nature of services requested;
- Geographic jurisdictions involved;
- Source of funds;
- Politically exposed persons (“PEPs”);
- Cross-border transactions; and
- Unusual payment arrangements or structures.

Enhanced due diligence may be undertaken where higher-risk circumstances are identified.

6. Client Due Diligence (“CDD”)

Prior to establishing a business relationship, the Company may undertake reasonable due diligence measures including:

- Verification of client identity;
- Verification of corporate ownership and beneficial ownership structures;
- Assessment of the nature and purpose of the engagement;
- Verification of source of funds where appropriate; and
- Screening against applicable sanctions lists.

The Company reserves the right to decline or terminate engagements where satisfactory due diligence cannot be completed.

7. Suspicious Activity Reporting

Any director, employee, or representative who becomes aware of suspicious activity, suspected money laundering, terrorist financing, fraud, bribery, or corruption must report the matter immediately to the designated compliance officer or senior management.

The Company shall maintain confidentiality in relation to internal investigations and reporting obligations and shall comply with applicable reporting requirements under UK law.

8. Record Keeping

The Company shall maintain accurate and secure records relating to:

- Client identification documents;
- Due diligence materials;
- Transaction records;
- Risk assessments; and
- Compliance reviews.

Records shall be retained for the period required by applicable law and regulatory guidance.

9. Training and Awareness

The Company is committed to ensuring that relevant personnel understand:

- Money laundering and financial crime risks;
- Their obligations under this Policy;
- Reporting procedures; and
- Applicable legal and regulatory requirements.

Training and awareness measures may be implemented periodically as appropriate to the nature and scale of the Company's operations.

10. Anti-Bribery and Corruption

The Company prohibits all forms of bribery and corruption and shall not:

- Offer, promise, give, request, or accept bribes;
- Facilitate improper payments; or
- Engage in conduct that may improperly influence business decisions.

All business dealings must be conducted lawfully, ethically, and transparently.

11. Monitoring and Review

This Policy shall be reviewed periodically to ensure continued effectiveness, regulatory compliance, and alignment with the Company's operational activities and risk profile.

12. Responsibility for Compliance

Ultimate responsibility for AML compliance rests with the Directors of the Company. All personnel are required to comply with this Policy and support the Company's commitment to lawful and ethical business practices.

13. Approval

This Policy was approved by the Directors of Kogweno & Bubi Consultants Ltd and is effective as of:

Effective Date: 27th February 2026

**Authenticated by Director - Josephine Kogweno
Kogweno & Bubi Consultants Ltd**