

# Anti-Money Laundering & KYC Policy

Effective Date: 1 January 2026 | Last Updated: March 2026 | NAMH Global LTD

NAMH Global LTD is committed to the highest standards of Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) compliance. This policy establishes our framework for preventing, detecting, and reporting money laundering, terrorist financing, and other financial crimes. NAMH Global takes a zero-tolerance approach to financial crime.

## 1. Legal Framework

This policy is established in compliance with:

- The Saint Lucia Money Services Business Act and associated AML/CTF regulations
- The Financial Action Task Force (FATF) Forty Recommendations and related guidance
- International sanctions frameworks maintained by OFAC (US), HM Treasury (UK), EU, and UN
- Eastern Caribbean Central Bank (ECCB) and FSRA (Financial Services Regulatory Authority) guidelines

## 2. Know Your Customer (KYC) Requirements

NAMH Global applies a rigorous KYC process to all prospective and existing clients. Identity must be verified before opening a trading account, and additional documentation may be requested at any stage.

### 2.1 Individual Clients — Required Documents

- **Valid passport, national identity card, or government-issued driving licence. Must clearly display full name, date of birth, photograph, and expiry date.** Photo ID (one of):
- **Utility bill, bank or credit card statement, or government correspondence. Must be dated within the last 90 days and display your full name and residential address.** Proof of Address (one of):
- **Written statement or supporting documentation confirming the origin of deposited funds.** Source of Funds Declaration:

### 2.2 Corporate Clients — Required Documents

- Certificate of Incorporation and Articles / Memorandum of Association
- Certificate of Good Standing (not older than 6 months)
- Register of Directors and Shareholders including percentage ownership
- Proof of registered company address (not older than 90 days)
- Board Resolution authorising individual(s) to operate the account
- Full KYC documentation for all directors, authorised signatories, and beneficial owners holding 10%+
- Source of Funds and Source of Wealth declarations for the entity

## 3. Risk-Based Approach

NAMH Global categorises clients into Low, Medium, and High risk tiers based on: jurisdiction of residence and citizenship; nature of business or profession; volume and frequency of trading; Politically Exposed Person (PEP) status; and adverse media screening results.

### 3.1 Enhanced Due Diligence (EDD)

- **Individuals holding or who have held prominent public functions, their family members and close associates, require EDD including enhanced source of wealth verification and senior management approval.** Politically Exposed Persons (PEPs):
- **Clients from FATF-identified high-risk jurisdictions are subject to additional scrutiny and may require compliance team approval.** High-Risk Jurisdictions:
- **Deposits or withdrawals above established thresholds trigger enhanced verification regardless of account risk tier.** High-Value Transactions:

## 4. Ongoing Monitoring

- Real-time transaction monitoring for unusual patterns inconsistent with a client's stated profile
- Periodic re-screening of all clients against updated sanctions lists and PEP databases
- Triggered reviews upon significant changes in client activity, profile, or circumstances
- Automated alerts for transactions that exceed defined thresholds or deviate from behavioural patterns

## 5. Suspicious Activity Reporting

All staff are required to report suspicions of money laundering or terrorist financing to our designated Money Laundering Reporting Officer (MLRO) without delay. The MLRO will assess and, where appropriate, file a Suspicious Activity Report (SAR) with the relevant financial intelligence unit.

NAMH Global operates a strict tipping-off prohibition. Clients must not be informed they are under investigation or that a SAR has been filed. Failure to comply may result in disciplinary action and criminal liability.

## 6. Sanctions Screening

All clients are screened against applicable international sanctions lists at onboarding and on an ongoing basis:

- OFAC Specially Designated Nationals (SDN) and Blocked Persons List
- HM Treasury (UK) Financial Sanctions Target List
- European Union Consolidated Sanctions List
- United Nations Security Council Consolidated Sanctions List

Accounts found to be connected to sanctioned persons will be frozen immediately and reported to the relevant authorities.

## 7. Deposit and Withdrawal Controls

- All client funds must originate from accounts held in the client's own name — third-party deposits are strictly prohibited
- Cash deposits are not accepted under any circumstances
- All withdrawals are returned to the original funding source wherever possible

- Withdrawals to alternative accounts require enhanced due diligence and documented approval
- Large or unusual fund movements trigger monitoring alerts and may require source of funds explanation

## 8. Record Keeping

NAMH Global retains comprehensive records of all client identification documentation, transaction records, and compliance decisions for a minimum of 5 years following the end of the client relationship, or longer where required by law. All records are maintained securely and available for regulatory inspection upon lawful request.

## 9. Staff Training

All NAMH Global employees receive mandatory AML/CTF training at induction and on an ongoing basis, covering: recognition of money laundering red flags; KYC procedures and documentation standards; internal reporting obligations and the tipping-off prohibition; sanctions screening; and record-keeping requirements.

## 10. Non-Compliance and Enforcement

Accounts found to be in violation of this policy may be suspended or terminated without notice. Funds associated with suspected AML violations may be frozen pending investigation and regulatory disclosure. NAMH Global cooperates fully with law enforcement and regulatory authorities in connection with any investigation.

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**NAMH GLOBAL LTD — ALWAYS FORWARD.**

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