OFFICIAL PUBLIC POLICY

Anti-Money Laundering and Know-Your-Customer Policy

Document information	Details
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Legal entity	Ergenso Ltd
Registration and licence	Company No. HV00726497 | Mwali Licence No. BFX2026056

This document is issued by Ergenso Ltd and applies from the effective date above. Where it refers to the Client Portal, a Current Schedule or a product-specific disclosure, the version provided for the relevant account, product and jurisdiction applies.

N.1 Risk-based programme

Ergenso maintains a risk-based programme intended to prevent its services from being used for money laundering, terrorist financing, proliferation financing, fraud, sanctions evasion, bribery, tax crime and other financial crime. This public summary does not reveal confidential monitoring rules or reporting thresholds.

N.2 Customer due diligence

- Verify identity, date of birth or formation, address and contact information using reliable, independent data or documents.
- Identify and verify beneficial owners, controllers, authorised persons and the purpose and intended nature of the relationship.
- Understand occupation or business, expected activity, source of funds and, where risk requires, source of wealth.
- Screen clients and related persons against applicable sanctions, PEP, adverse-media and internal risk sources.
- Refresh information and evidence based on risk and event triggers.

N.3 Enhanced due diligence

Additional evidence, management approval, enhanced monitoring or refusal may apply to politically exposed persons, high-risk countries, complex ownership, unusual payment routes, crypto exposure, adverse information, non-face-to-face risk, high activity or transactions inconsistent with the known profile.

N.4 Ongoing monitoring

Transactions, devices, logins, funding, trading, withdrawals and account changes may be monitored to identify unusual or suspicious patterns. We may request an explanation and supporting evidence,

restrict an account, refuse a transaction, terminate the relationship or make a confidential report where required.

N.5 Prohibited relationships

- Anonymous or fictitious accounts and undisclosed nominees.
- Persons or entities subject to applicable asset-freeze or service prohibitions.
- Shell banks or payment routes lacking a legitimate economic purpose.
- Clients who refuse required verification, provide materially false information or attempt to evade controls.
- Third-party or pass-through activity not approved for a legitimate documented purpose.

N.6 Recordkeeping and confidentiality

CDD, transaction, communication, screening, investigation and reporting records are retained for at least five years after the relationship or transaction, or longer where applicable law, litigation hold or regulatory direction requires. Reports and investigations are confidential, and Ergenso may be legally unable to explain them.

N.7 Client cooperation

Clients must respond promptly and accurately to reasonable verification requests. Ergenso may not complete a deposit, trade, advice service or withdrawal until required checks are complete. Verification does not guarantee account acceptance or continued service.