



Anti-Money Laundering and Counter-Terrorist Financing Policy



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1. Introduction

Altum Ltd (hereinafter referred to as the "Company") is incorporated under the laws of the Republic of Seychelles and licensed by the Financial Services Authority (FSA). The Company is committed to the highest standards of Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) compliance in accordance with the Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020 (the "AML & CFT Act 2020") and related regulations.

The purpose of this Policy is to prevent the Company's services and systems from being used for money laundering, terrorist financing, or any activity that facilitates financial crime. The Company maintains internal procedures, controls, and training programs to ensure ongoing compliance with all applicable AML/CFT laws.

2. Key Principles

All employees of Altum Ltd are required to read and comply with the Company's internal AML/CFT Manual. The following key principles guide our AML framework:

- a) Implement robust measures to prevent, detect, and report any activity linked to money laundering or terrorist financing.
- b) Establish and maintain written internal procedures for risk-based customer due diligence (CDD) and transaction monitoring.
- c) Prohibit anonymous or fictitious accounts and ensure all clients are properly identified before entering into any business relationship.
- d) Report any suspicious transactions to the Financial Intelligence Unit (FIU) of Seychelles without delay.
- e) Retain all customer and transaction records for a minimum of seven (7) years in accordance with the AML & CFT Act 2020.
- f) Conduct regular staff training and awareness programs on AML/CFT obligations.

- g) Fully cooperate with the FIU, FSA, and other competent authorities when lawfully requested.
- h) Maintain continuous monitoring and review of AML/CFT systems, policies, and internal controls.

3. Responsibilities

The Board of Directors is responsible for approving this Policy and ensuring that adequate resources are allocated to implement effective AML/CFT systems. A designated Compliance Officer (CO) has been appointed and approved by the FSA, who is responsible for overseeing the implementation of the Company's AML framework.

The Compliance Officer is accountable to the Board and acts as the primary liaison with the FIU and regulatory authorities. All employees are obligated to promptly report any knowledge or suspicion of money laundering or terrorist financing to the CO.

4. Customer Verification and Due Diligence

Altum Ltd applies a risk-based approach (RBA) to customer due diligence. The Company verifies each customer's identity using reliable, independent documentation prior to establishing a business relationship. Enhanced Due Diligence (EDD) is conducted for high-risk clients, including Politically Exposed Persons (PEPs), clients from high-risk jurisdictions, and complex ownership structures. Simplified Due Diligence may apply only where a low risk has been established under law.

5. Reporting of Suspicious Transactions

All employees must immediately report any suspicious activity to the Compliance Officer using the prescribed internal reporting procedure. The Compliance Officer will evaluate



the report and, if appropriate, file a Suspicious Transaction Report (STR) to the FIU within the statutory timeframe. Employees are protected from liability when reporting in good faith and are strictly prohibited from tipping off clients regarding any investigation or STR submission.

6. Record Keeping and Training

The Company maintains complete records of customer identification data, transaction details, and internal reports for at least seven (7) years from the completion of the transaction or closure of the account. Regular AML/CFT training is mandatory for all employees and directors to ensure awareness of evolving typologies, regulatory changes, and reporting responsibilities.

7. Cooperation with Authorities

Altum Ltd cooperates fully with the Financial Services Authority, Financial Intelligence Unit, and law enforcement agencies to the extent permitted by Seychelles law. The Company provides access to records, reports, and documentation as required under applicable legislation.

8. Contact Information

For any AML/CFT-related enquiries, please contact:

Compliance Department – Altum Ltd

House of Francis, Room 302, Ile Du Port, Mahe, Seychelles

Email: compliance@altumbrokers.com