

# ANTI-MONEY LAUNDERING POLICY

CREDIT GLORIOUS  
PROPERTY HOLDINGS LTD.

COMPLIANCE AND REGULATORY AFFAIRS DEPARTMENT

# ANTI-MONEY LAUNDERING POLICY

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## PREAMBLE TO THE AML POLICY

At Credit Glorious Property Holdings Ltd., we recognize the critical importance of maintaining a robust and effective Anti-Money Laundering (AML) framework. This policy is a testament to our unwavering commitment to uphold the highest standards of ethical conduct and compliance with all applicable AML laws and regulations. As a respected entity in the financial sector, headquartered in London, we acknowledge our pivotal role in safeguarding the integrity of the financial system and contributing to the global effort against money laundering and terrorist financing.

## Our Ethical Foundation

Our AML policy is rooted in our core values of integrity, transparency, and responsibility. We believe that a strong ethical foundation is essential not only for compliance with legal obligations but also for the trust and confidence of our clients, partners, and the broader community.

## Global and Local Compliance

In an increasingly interconnected world, we recognize that our responsibilities extend beyond local borders. Our commitment encompasses adherence to both international standards and local regulations, ensuring a comprehensive and globally informed approach to AML.

## Proactive Stance Against Financial Crimes

We are dedicated to taking a proactive stance in identifying and mitigating the risks associated with money laundering and terrorist financing. Our policy reflects a deep understanding of the complexities and evolving nature of financial crimes, and it is designed to be dynamic and responsive to these challenges.

## Collective Responsibility

This policy underscores the collective responsibility of all members of Credit Glorious Property Holdings Ltd., from our executive leadership to our newest employees. We are united in our commitment to implement and adhere to these AML standards, recognizing that effective AML compliance is a shared obligation.

## Commitment to Continuous Improvement

We are committed to the principle of continuous improvement in our AML efforts. This involves regular review and enhancement of our policies and procedures, ongoing training and development for our staff, and a willingness to adapt and evolve in response to new threats and regulatory changes.

## Engagement and Collaboration

We believe in the power of engagement and collaboration with regulatory authorities, industry peers, and other stakeholders. Through open dialogue and cooperative efforts, we aim to contribute to the development of effective AML strategies and practices, both within our organization and across the financial sector.

This policy sets forth our approach and the specific measures we undertake to prevent, detect, and respond

to money laundering and terrorist financing activities. It is a declaration of our commitment to operate with the utmost integrity and to play our part in maintaining the security and stability of the global financial system.

## 1. POLICY STATEMENT

### Commitment to Compliance

*Legal Adherence:* Credit Glorious Property Holdings Ltd. is firmly committed to complying with all applicable laws and regulations related to anti-money laundering (AML) and countering the financing of terrorism (CFT) in the United Kingdom. This commitment extends to any international regulations that may apply to our cross-border activities.

*Ethical Standards:* Beyond legal compliance, our commitment is also rooted in our corporate ethical standards. We recognize that effective AML practices are not only a legal requirement but also a crucial aspect of corporate responsibility.

### Scope of Compliance

*All Business Activities:* This policy applies to all business activities of Credit Glorious Property Holdings Ltd., including but not limited to property transactions, financial services, and any other services we offer.

*Employee Involvement:* Every employee, from senior management to entry-level staff, is expected to adhere to this policy. Compliance with AML regulations is a company-wide responsibility, and all staff members are required to understand and implement the practices outlined in our AML policy.

### Zero Tolerance

*Prevention of Misuse:* We have a zero-tolerance policy towards the misuse of our services for money laundering or terrorist financing. Any employee found to be in violation of this policy will face strict disciplinary action, which may include termination of employment and legal action.

*Proactive Measures:* The company will proactively take measures to identify, assess, and manage the risks associated with money laundering and terrorist financing. This includes conducting thorough customer due diligence, monitoring financial transactions, and reporting suspicious activities to the relevant authorities.

### Continuous Improvement

*Policy Review and Update:* Recognizing that AML and CFT regulations and risks are continually evolving, Credit Glorious Property Holdings Ltd. is committed to regularly reviewing and updating this policy. This ensures that our practices remain effective and compliant with current laws and standards.

*Training and Awareness:* We are dedicated to providing ongoing training and resources to our employees to ensure they remain informed about the latest developments in AML regulations and best practices. This training will be tailored to the specific roles and responsibilities of our staff.

### Collaboration and Reporting

*Cooperation with Authorities:* Credit Glorious Property Holdings Ltd. will cooperate fully with law enforcement

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and regulatory authorities in their efforts to combat money laundering and terrorist financing. This includes timely reporting of suspicious activities and responding to lawful requests for information.

*Transparency with Stakeholders:* We are committed to maintaining transparency with our stakeholders, including clients, shareholders, and regulatory bodies, about our AML policies and practices.

## 2. SCOPE

### Applicability Across the Organization

*Universal Application:* This AML policy applies universally across all levels and departments of Credit Glorious. It encompasses all employees, including full-time, part-time, contract, and temporary staff, as well as senior executives and members of the BoD.

*Operational Coverage:* The policy is relevant to all aspects of our operations, including but not limited to property dealings, financial transactions, client interactions, and any other business activities that the company undertakes.

### Geographic and Jurisdictional Coverage

*Primary Focus in the UK:* Given our headquarters in London, the policy is primarily aligned with the UK's AML regulatory framework. This includes adherence to the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002, and the Terrorism Act 2000.

*International Operations:* For operations extending beyond the UK, this policy also takes into account international AML standards and regulations applicable in those jurisdictions. This ensures a consistent and compliant approach to AML across all our global activities.

### Inclusion of Business Relationships

*Third-Party and Partners:* The scope of this policy also extends to our business relationships, including clients, suppliers, partners, and any third parties engaged in business with Credit Glorious Property Holdings Ltd. We expect all associated parties to adhere to similar AML standards and will conduct due diligence to ensure this compliance.

*Contractual Agreements:* AML compliance requirements will be integrated into contractual agreements with third parties to ensure that our business relationships uphold the same high standards of AML compliance.

### Integration with Other Policies and Procedures

*Alignment with Other Policies:* This AML policy is part of a broader set of corporate policies and procedures. It should be read in conjunction with our other policies, including but not limited to our ethics policy, data protection policy, and corporate governance guidelines.

*Consistency with Risk Management:* The principles and practices outlined in this AML policy are consistent with the company's overall risk management framework. They contribute to the identification, assessment, and mitigation of financial crime risks.

### Continuous Monitoring and Review

*Dynamic Nature:* Recognizing the dynamic nature of financial crime risks, this policy is subject to ongoing

monitoring and review. This ensures that our AML practices remain effective and responsive to changing regulatory landscapes and emerging risks.

*Feedback and Adaptation:* We encourage feedback from employees and stakeholders on the effectiveness of this policy. Such feedback is vital for continuous improvement and adaptation of our AML strategies.

## 3. OBJECTIVES

### Establishing a robust AML Framework

*Comprehensive AML System:* We are committed to developing and maintaining a comprehensive Anti-Money Laundering (AML) system. This system encompasses effective policies, procedures, and controls designed to prevent, detect, and report money laundering and terrorist financing activities.

*Alignment with Legal Requirements:* Our AML framework will be in full compliance with UK laws, including the Proceeds of Crime Act, the Terrorism Act, and the Money Laundering Regulations. Additionally, we will adhere to international standards where applicable, ensuring a robust and globally compliant AML stance.

### Risk Management

*Identifying and Assessing Risks:* We will regularly identify and assess the risks of money laundering and terrorist financing that our company may reasonably expect to face. This assessment will be based on the nature of our business, client profiles, and transaction types.

*Mitigating Identified Risks:* Appropriate measures will be implemented to mitigate the identified risks. Our approach to risk mitigation will be tailored to the level of risk associated with each customer and transaction, ensuring a proportionate and effective response.

### Training and Culture

*Employee Training:* Ongoing training will be provided to all employees to ensure they are fully aware of their roles and responsibilities in AML compliance. This training will cover understanding the risks associated with money laundering, and equipping staff with the knowledge to identify and report suspicious activities.

*Promoting a Culture of Compliance:* We are dedicated to fostering a company culture that emphasizes the importance of AML compliance, ethical behavior, and the reporting of suspicious activities. This culture will be ingrained at all levels of the organization, ensuring a unified and committed approach to AML compliance.

### Compliance and Reporting

*Effective Monitoring and Reporting:* Systems will be established for monitoring customer transactions and relationships to identify unusual or suspicious activities. We will ensure timely reporting of such activities to the appropriate authorities, maintaining a vigilant and proactive stance against money laundering and terrorist financing.

*Internal Controls-Audits:* We will implement internal controls to regularly review and audit our AML procedures and compliance. This will ensure the effectiveness of our AML measures and adherence to policy, maintaining the highest standards of AML compliance.

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## 4. CUSTOMER DUE DILIGENCE (CDD)

### CDD Procedures

*Initial Due Diligence:* We will conduct thorough due diligence on all new customers before establishing a business relationship. This process includes verifying the customer's identity, understanding the nature of their business, and assessing their risk profile. This initial assessment is crucial in establishing a baseline understanding of our customers and their business activities.

*Ongoing Monitoring:* Our responsibility extends beyond the initial due diligence. We will continuously monitor existing customers' transactions and business relationships. This ongoing scrutiny ensures that their activities remain consistent with our knowledge of their business and risk profile, allowing us to promptly identify and address any anomalies or risks.

### Enhanced Due Diligence (EDD)

*High-Risk Customers:* For customers identified as high-risk, such as those with complex corporate structures or from high-risk jurisdictions, we will conduct enhanced due diligence. This process may include obtaining additional information about the customer, their business activities, and the nature of their transactions to better understand and mitigate potential risks.

*Politically Exposed Persons (PEPs):* Customers who are identified as politically exposed persons, including their family members or close associates, will be subject to enhanced scrutiny. This is to ensure that we adequately manage and mitigate the higher risks associated with PEPs.

### Simplified Due Diligence

*Low-Risk Situations:* In situations where the risk of money laundering or terrorist financing is assessed as low, we may apply simplified due diligence measures. However, this decision will always be based on a documented risk assessment, ensuring that our approach is proportionate to the identified risks.

### Record-Keeping

*Documentation and Records:* We will keep comprehensive records of all CDD measures. This includes documentation related to the identification and verification of customers, risk assessments conducted, and the rationale behind the level of due diligence applied.

*Retention Period:* These records will be maintained for a minimum period as required by UK law, ensuring they are readily available for inspection by regulatory authorities.

### Regular Updates and Reviews

*Updating Customer Information:* We will regularly update customer information, particularly for those classified as high-risk, to ensure that our records reflect their current status and relevant changes.

*Review of CDD Measures:* Our CDD measures will be periodically reviewed to ensure they remain appropriate and effective. This review process will take into account any changes in the customer's circumstances or risk

profile, adapting our approach as necessary to maintain effective due diligence.

## 5. RECORD KEEPING

### Maintaining Accurate and Comprehensive Records

*Documentation of CDD:* We will maintain detailed records of all Customer Due Diligence (CDD) processes. This includes documentation of identity verification, risk assessments, and any due diligence checks performed, capturing the methods and sources used for verification.

*Transaction Records:* Comprehensive records of all transactions will be maintained. These records will include details such as amounts, dates, the nature of the transactions, and parties involved, covering both domestic and international transactions.

### Record Retention

*Retention Period:* In compliance with UK law, we will retain all AML-related records for a minimum of five years after the termination of a business relationship or the completion of a transaction.

*Accessibility:* These records will be readily accessible and will be provided promptly to law enforcement and regulatory agencies upon request.

### Data Protection and Security

*Confidentiality:* The confidentiality and security of AML records will be stringently safeguarded. Access to these records will be restricted to authorized personnel only.

*Compliance with Data Protection Laws:* All records will be managed and stored in accordance with the UK Data Protection Act and GDPR, ensuring the protection of personal data.

### Regular Review and Audit

*Audit of Records:* Regular audits will be conducted to ensure the accuracy and completeness of AML records.

*Updating Records:* Records will be updated regularly to reflect any changes in customer information or risk profiles.

## 6. MONITORING AND REPORTING

### Continuous Monitoring

*Ongoing Scrutiny:* We will continuously monitor customer transactions and business relationships to identify unusual or potentially suspicious activities indicative of money laundering or terrorist financing.

*Automated Systems:* Advanced software systems will be utilized for transaction monitoring to enhance the detection of suspicious patterns and anomalies.

### Reporting Suspicious Activities

*Suspicious Activity Reports (SARs):* In cases where suspicious activity is detected, Suspicious Activity Reports (SARs) will be promptly filed with the UK's National Crime Agency (NCA).

*Internal Reporting Procedures:* Clear internal procedures will be established for employees to report suspicious activities, including designating a point of contact for reporting, typically the Compliance Officer.

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## Compliance with Reporting Obligations

*Timely Reporting:* All reports to the NCA and other regulatory bodies will be made in a timely and efficient manner, in accordance with statutory requirements.

*Record of Reports:* A record of all reports made to regulatory authorities will be maintained, including the date, nature of the report, and any follow-up actions taken.

## Employee Training and Awareness

*Training Programs:* Regular training sessions will be conducted for employees to recognize and handle suspicious transactions. This training will cover the process of reporting internally and the legal obligations for reporting to authorities.

*Awareness Campaigns:* Ongoing awareness campaigns will be implemented within the organization to keep AML responsibilities and reporting procedures at the forefront of business operations.

## Review and Adaptation

*Regular Review of Monitoring Processes:* Monitoring processes and reporting mechanisms will be regularly reviewed and updated to ensure they remain effective and are aligned with current regulatory requirements.

*Feedback and Improvement:* Feedback from employees on the monitoring and reporting processes will be encouraged, and suggestions for improvements will be incorporated.

## 7. COMPLIANCE OFFICER

### Role and Appointment

*Appointment:* Credit Glorious will appoint a qualified Compliance Officer who possesses adequate experience and knowledge of AML regulations and practices, particularly those relevant to the UK context.

*Seniority and Independence:* The Compliance Officer will hold a position of sufficient seniority to influence company policy and practices and will operate independently to ensure unbiased oversight of AML activities.

### Responsibilities, Authority, and Reporting

*Policy Development and Implementation:* Develop, implement, and maintain an effective AML program compliant with UK laws. This includes creating and updating AML and Counter-Financing of Terrorism (CFT) policies, procedures, and controls.

*Training and Awareness:* Oversee the development and delivery of AML training programs for all employees, ensuring awareness and understanding of AML responsibilities and risks.

*Monitoring and Reporting:* Establish and maintain systems for monitoring customer transactions and identifying suspicious activities. Ensure appropriate investigation and reporting to the National Crime Agency (NCA).

*Record Keeping:* Oversee the maintenance of all AML records, ensuring compliance with legal requirements and availability for regulatory inspections.

*Risk Assessment:* Regularly conduct and update AML risk assessments to align the company's AML strategies with its risk profile.

*Regulatory Liaison:* Act as the primary contact for regulatory bodies, managing external communication and reporting with authorities like the Financial Conduct Authority (FCA) and NCA.

*Audit and Compliance Testing:* Facilitate and support internal and external audits of the AML program, addressing any deficiencies identified.

*Advisory Role:* Provide ongoing advice and guidance on AML matters to management and staff, keeping them informed of legislative and best practice developments.

*Stakeholder Engagement:* Engage with various stakeholders to integrate AML considerations into business practices and decision-making processes.

## Authority

*Decision-Making:* Hold the authority to make decisions regarding the AML program, including implementing controls and corrective actions.

*Access to Information:* Have unrestricted access to all company records, data, and staff necessary to perform duties effectively.

## Reporting

*Regular Reporting:* Provide regular reports to senior management and the board of directors on the AML program status, including identified risks, compliance issues, and monitoring outcomes.

## 8: TRAINING

### Regular and Comprehensive Training Programs

*Initial Training:* All new employees at Credit Glorious Property Holdings Ltd will receive comprehensive AML training. This training will cover the basics of money laundering, legal obligations, and the specific AML procedures of our company.

*Ongoing Training:* We will conduct regular training sessions for all staff to update their knowledge and inform them of changes in AML legislation, regulations, and best practices.

### Tailored Training Content

*Role-Specific Training:* Training content will be tailored to specific roles and responsibilities within the company, with in-depth training for staff handling transactions.

*Interactive and Engaging Methods:* A variety of training methods, including workshops, e-learning, and scenario-based exercises, will be used to ensure effective learning.

### Training Records and Evaluation

*Documentation of Training:* Detailed records of all AML training sessions, including attendance and content, will be maintained.

*Assessment of Training Effectiveness:* The effectiveness of training will be regularly assessed through tests, surveys, or feedback forms.

## 9: REVIEW AND AUDIT

### Regular Review of AML Policies and Procedures

*Periodic Policy Review:* Our AML policy and procedures will undergo regular reviews to ensure their effectiveness, compliance, and alignment with best practices.



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*Incorporating Changes in Regulations:* We will update our AML policy and procedures in response to changes in laws, regulations, and emerging trends.

## Internal and External Audits

*Internal Audits:* Internal audits will be performed to assess the effectiveness of our AML program.

*External Audits:* External auditors will be engaged for independent assessments of our AML program.

## Compliance Testing

*Regular Compliance Testing:* Regular testing of AML controls and procedures will be conducted.

*Corrective Actions:* Prompt implementation of corrective actions will be ensured based on audit and compliance test findings.

## Feedback Mechanism

*Encouraging Employee Feedback:* A mechanism for employee feedback on the AML program will be established.

*Management Review:* Senior management will review audit outcomes, compliance tests, and employee feedback for oversight and necessary changes.

## 10: PENALTIES FOR NON-COMPLIANCE

### Internal Disciplinary Actions

*Clear Consequences:* We will establish clear consequences for employees who fail to comply with the AML policy, ranging from formal warnings to termination of employment, depending on the severity of the non-compliance.

*Case-by-Case Evaluation:* Each instance of non-compliance will be evaluated on a case-by-case basis, considering factors such as the nature of the violation, its impact, and whether it was a repeat offense.

### Legal and Regulatory Repercussions

*Legal Penalties:* Employees must be aware that, in addition to internal disciplinary actions, they may face legal penalties for non-compliance with AML laws, including fines, criminal charges, and imprisonment, depending on the offense's severity.

*Regulatory Sanctions:* The company may face regulatory sanctions, including fines and restrictions on business activities, for failure to comply with AML regulations, which can have significant financial and reputational consequences.

### Reporting to Authorities

*Obligation to Report:* In cases of serious non-compliance or criminal activity, the company is obligated to report such actions to the relevant authorities, in accordance with legal and regulatory requirements.

### Transparency and Accountability

*Record of Violations:* We will maintain a record of all violations of the AML policy, including the nature of the violation, the investigation conducted, and the disciplinary action taken.

*Management Oversight:* Senior management will be informed of any significant instances of non-compliance

and involved in decisions regarding disciplinary actions and reporting to authorities.

## 11 - RISK ASSESSMENT

### Regular Risk Assessments

*Comprehensive Risk Assessment:* Our organization is committed to conducting regular and comprehensive risk assessments. These assessments are crucial in identifying potential risks of money laundering and terrorist financing associated with our customers, products, services, and geographic locations.

*Dynamic Risk Profiling:* We will dynamically update our risk profiles in response to changes in customer behavior, business relationships, and external risk factors. This approach ensures that our risk assessments remain current and relevant.

### Factors in Risk Assessment

*Customer Risk:* We will assess risks based on customer characteristics, including their business nature, geographic location, and transaction patterns. Understanding our customers is key to identifying and mitigating potential risks.

*Product and Service Risk:* The risks associated with different products and services offered by our company, especially those susceptible to misuse for money laundering, will be thoroughly evaluated.

*Geographic Risk:* We will consider the risk level of different geographic regions, including countries with high levels of corruption, weak AML regulations, or known as high-risk areas for money laundering and terrorist financing.

### Documentation and Reporting

*Documenting Risk Assessments:* Detailed documentation of all risk assessments will be maintained. This includes the methodology used, the findings, and any actions taken in response to the identified risks.

*Reporting to Management:* The outcomes of risk assessments will be regularly reported to senior management. This ensures that they are fully aware of the risk landscape and are involved in decision-making regarding risk mitigation strategies.

## 12 - TECHNOLOGY AND DATA ANALYTICS

### Implementation of Advanced Technologies

*AML Software Solutions:* Our organization commits to deploying state-of-the-art AML software solutions. These tools are essential for enhancing the efficiency and effectiveness of our monitoring and screening processes. This includes the use of advanced transaction monitoring systems, customer due diligence platforms, and sanctions screening tools.

*Continuous System Upgrades:* We will regularly update and upgrade our technological tools to ensure they remain effective against evolving money laundering tactics and comply with the latest regulatory requirements. This ongoing commitment to technological advancement is key to maintaining robust AML defenses.

### Utilization of Data Analytics

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*Data-Driven Approaches:* Our strategy involves leveraging data analytics to identify patterns, trends, and anomalies in financial transactions that may indicate money laundering activities. By analyzing large and complex datasets, we can uncover hidden risks and take proactive measures.

*Predictive Analytics:* We will utilize predictive analytics to proactively identify potential risks and vulnerabilities in customer behavior and transaction flows. This forward-looking approach allows us to anticipate and mitigate risks before they materialize.

## Integration and Automation

*System Integration:* We will ensure that our AML technology systems are fully integrated with other internal systems, such as customer relationship management (CRM) and banking platforms. This integration provides a holistic view of customer activities and risks, enhancing our ability to detect and respond to potential AML threats.

*Automation of Processes:* To improve efficiency and reduce the likelihood of human error, we will automate routine AML processes. Automation in customer screening and transaction monitoring will enable us to handle large volumes of data more effectively and respond swiftly to potential threats.

## Training and User Support

*Employee Training:* We are committed to providing comprehensive training to relevant employees on how to effectively use AML technology tools. This training will ensure that our staff are well-equipped to interpret system alerts, understand data analytics results, and take appropriate actions.

*Technical Support:* We will ensure ongoing technical support and user assistance for our AML technology systems. This support is crucial for enabling employees to address technical issues promptly and maintain operational efficiency.

## 13: THIRD-PARTY AND PARTNER DUE DILIGENCE

### Due Diligence on Third Parties

*Risk-Based Approach:* We will conduct thorough due diligence on all third-party partners, suppliers, and intermediaries to assess their AML risk profile. This includes evaluating their AML policies, practices, and reputation in the market.

*Ongoing Monitoring:* We commit to continuously monitor third-party relationships for changes in risk status, including regular reviews of their AML compliance and any relevant legal or regulatory actions against them.

### Contractual Requirements

*AML Clauses in Contracts:* Our contracts with third parties will include specific clauses that mandate compliance with AML regulations and standards. These clauses will outline the expectations, responsibilities, and consequences of non-compliance.

*Right to Audit:* We reserve the right to audit third parties for AML compliance, either directly or through independent auditors, to ensure adherence to contractual obligations.

## Training and Collaboration

*Training for Third Parties:* We will provide training resources or guidance to third parties, especially if they are small or medium-sized enterprises, to help them understand and meet the required AML standards.

*Collaborative Efforts:* We will encourage collaboration with third parties in developing and enhancing AML strategies, sharing best practices, and staying informed about emerging risks and trends.

## Termination of Relationships

*Criteria for Disengagement:* We will establish clear criteria for terminating relationships with third parties that fail to meet AML standards or pose a high risk of money laundering.

*Process for Termination:* We will implement a structured process for disengaging with third parties, ensuring that all legal and contractual obligations are met and that the termination does not adversely affect the company's operations or reputation.

## 14: EXTERNAL COMMUNICATION AND TRANSPARENCY

### Open Communication with Regulatory Bodies

*Regular Reporting:* We will ensure regular and transparent communication with regulatory authorities, including the Financial Conduct Authority (FCA) and the National Crime Agency (NCA) in the UK. This involves timely reporting of compliance activities, audits, and any significant AML-related incidents.

*Response to Inquiries:* We will promptly respond to inquiries and requests for information from regulatory bodies, demonstrating a cooperative and proactive stance in AML compliance.

### Engagement with Industry and Public

*Industry Collaboration:* We will actively engage with industry groups, forums, and other organizations to stay abreast of AML trends, share best practices, and contribute to the development of industry standards.

*Public Disclosure:* We will maintain transparency with the public and stakeholders regarding our AML efforts. This may include publishing annual reports or statements on our website detailing our AML activities and achievements.

### Media and Public Relations

*Media Communication:* We will manage communication with the media regarding AML matters carefully and responsibly, ensuring that information shared is accurate and reflects the company's commitment to AML compliance.

*Public Statements:* We will make public statements or press releases when necessary to address significant AML-related events or changes in policy, ensuring that the company's stance and actions are clearly communicated.

## 15: CONTINUOUS IMPROVEMENT

### Regular Review and Enhancement of AML Strategies

*Ongoing Evaluation:* We commit to the continuous evaluation of the effectiveness of our AML policies and



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procedures. This will involve regular assessments of the outcomes of our monitoring systems, the effectiveness of our training programs, and the adequacy of our risk assessment methodologies.

*Incorporating Feedback and Learning:* We will actively seek and incorporate feedback from our employees, auditors, regulatory bodies, and industry peers to continuously improve our AML strategies.

## Adaptation to Changing Environments

*Responsiveness to New Threats:* Our organization will remain vigilant and responsive to emerging money laundering threats and techniques. We will adapt our AML strategies to address new types of risks as they arise.

*Regulatory Changes:* We will stay informed about changes in AML legislation and regulatory requirements, both in the UK and in other jurisdictions where we operate, and adjust our policies and procedures accordingly.

## Innovation and Best Practices

*Leveraging Technology:* We will explore and integrate new technological advancements and data analytics tools to enhance our AML efforts. This includes adopting innovative solutions for transaction monitoring, customer due diligence, and reporting.

*Benchmarking Against Best Practices:* We will regularly benchmark our AML practices against industry best practices and standards to ensure that our approach remains at the forefront of effectiveness and compliance.

## Employee Involvement and Feedback

*Encouraging Employee Participation:* We will foster an environment where employees are encouraged to contribute ideas and suggestions for improving AML processes and strategies.

*Feedback Mechanisms:* We will implement effective mechanisms for employees to provide feedback on AML practices, ensuring that their insights and experiences are considered in the continuous improvement process.

## 16. COMPLIANCE OFFICER ROLE AND RESPONSIBILITIES

### Designation of a Compliance Officer

*Appointment:* A dedicated Compliance Officer will be appointed, possessing sufficient authority, independence, and resources to oversee the company's AML program. This individual will have relevant experience and knowledge in AML regulations and practices.

*Accessibility:* The Compliance Officer will be easily accessible to all employees for guidance and reporting of suspicious activities.

### Key Responsibilities

*Policy Oversight:* Responsible for overseeing the development, implementation, and management of the company's AML policy and procedures.

*Training and Guidance:* Coordinate and oversee the AML training program for employees, ensuring comprehensive training and information dissemination about AML obligations and procedures.

*Monitoring and Reporting:* Supervise the monitoring of customer transactions and activities, ensuring that suspicious activities are appropriately identified, investigated, and reported.

*Regulatory Liaison:* Serve as the primary point of contact with regulatory bodies for AML matters, including reporting, inquiries, and audits.

## Regular Reporting to Senior Management

*AML Reports:* Regularly report to senior management on the effectiveness of the AML program, highlighting significant compliance issues, trends in suspicious activities, and the status of reported incidents.

*Recommendations for Improvement:* Provide recommendations to senior management for enhancing the AML program and addressing identified weaknesses or risks.

## 17. SENIOR MANAGEMENT COMMITMENT

### Leadership and Oversight

*Active Involvement:* Senior management is committed to actively setting the tone for AML compliance, demonstrating a clear commitment to maintaining high AML standards and practices.

*Strategic Direction:* Senior management will provide strategic direction and support for the AML program, ensuring it aligns with the company's overall business strategy and risk management framework.

### Resource Allocation

*Adequate Resources:* The company will allocate sufficient resources, including staffing, technology, and budget, to effectively implement and maintain the AML program.

*Support for Compliance Officer:* Senior management will ensure that the Compliance Officer receives the necessary support and resources to effectively carry out their responsibilities.

### Decision-Making and Policy Approval

*Policy Approval:* Senior management will approve AML policies and procedures, ensuring they are comprehensive, up-to-date, and comply with legal and regulatory requirements.

*Risk Management Decisions:* Decisions regarding AML risk management, including the approval of risk assessment methodologies and risk mitigation strategies, will be made based on informed judgment.

### Regular Review and Engagement

*Review of AML Reports:* Senior management will regularly review reports from the Compliance Officer, engaging in discussions about the effectiveness of the AML program, identification of emerging risks, and addressing compliance issues.

*Engagement in Continuous Improvement:* Senior management will actively engage in the continuous improvement of the AML program, endorsing necessary changes and enhancements to meet evolving AML challenges and regulatory expectations.

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## 18. LEGAL AND REGULATORY COMPLIANCE

### Adherence to Laws and Regulations

*Compliance with UK Laws:* The company will strictly adhere to all relevant UK laws and regulations related to AML, including the Proceeds of Crime Act, the Terrorism Act, and the Money Laundering Regulations.

*International Compliance:* For operations outside the UK, the company will comply with applicable AML laws and regulations in each jurisdiction, respecting the nuances of regional AML frameworks.

### Regular Legal Updates

*Staying Informed:* The AML policy and procedures will be regularly updated in response to changes in AML legislation and regulatory guidance, both within the UK and in international jurisdictions where the company operates.

*Legal Advisory:* The company will engage with legal experts or advisors to ensure the accurate interpretation and implementation of AML laws and regulations.

### Regulatory Filings and Documentation

*Timely Filings:* The company will ensure timely and accurate regulatory filings, including reports of suspicious activities and mandatory disclosures, as required by law.

*Record of Compliance:* Comprehensive records of all compliance efforts, regulatory filings, and communications with regulatory bodies will be maintained.

### Risk-Based Compliance Approach

*Risk Assessment:* A risk-based approach to compliance will be implemented, tailoring AML measures to the specific risks associated with different customers, products, and geographic areas.

*Dynamic Adjustment:* Compliance strategies will be dynamically adjusted in response to evolving legal and regulatory landscapes and emerging risks.

## 19. CUSTOMER AWARENESS AND EDUCATION

### Informing Customers

*AML Information:* The company will provide clear and concise information to customers about its AML policies and procedures, explaining the necessity of certain information and documentation for customer due diligence.

*Transparency in Processes:* Transparency will be maintained with customers regarding AML processes, especially in relation to transaction monitoring and reporting obligations.

### Educational Materials

*Availability of Resources:* Educational materials will be made available to customers to help them understand the importance of AML measures and their role in preventing financial crimes.

*Tailored Communication:* Communication will be tailored to different customer segments for clarity and relevance, utilizing various formats such as brochures, website content, and direct communications.

### Customer Feedback

*Encouraging Feedback:* The company will encourage feedback from customers on AML-related processes, using their insights to improve customer experience and the effectiveness of AML measures.

*Responsive to Concerns:* The company will be responsive to customer concerns or queries regarding AML policies, ensuring clear and helpful communication.

### Collaboration for Better Compliance

*Partnering with Customers:* A collaborative approach will be fostered with customers in the fight against money laundering, emphasizing their role in identifying and reporting suspicious activities.

*Building Trust:* Trust will be built with customers by demonstrating the company's commitment to ethical practices and the protection of the financial system against abuse.

## 20. INTEGRATION OF AML POLICIES INTO BUSINESS STRATEGY

### Alignment with Business Objectives

*Strategic Integration:* AML policies will be integrated into the overall business strategy of Credit Glorious Property Holdings Ltd., aligning AML objectives with the company's broader goals, including market expansion, customer satisfaction, and corporate governance.

*Business Decision-Making:* AML considerations will be incorporated into key business decisions, such as new product launches, market entries, and partnership formations, to ensure alignment with AML compliance requirements.

### Risk Management Framework

*Incorporating AML into Risk Management:* AML considerations will be embedded into the company's overall risk management framework, identifying and assessing AML risks as part of broader risk assessment processes and ensuring AML risk mitigation strategies are in place.

*Risk-Based Resource Allocation:* Resources, including staffing and technology investments, will be allocated based on the AML risk profile of different business areas, with higher-risk areas receiving more focused attention and resources.

### Corporate Culture and Ethics

*Cultivating an AML-Conscious Culture:* A corporate culture that values AML compliance and ethical conduct will be fostered, encouraging employees at all levels to act as guardians against money laundering activities.

*Ethical Business Practices:* Ethical business practices will be promoted, emphasizing the company's role in safeguarding the financial system and society against money laundering.

### Customer Relationships

*AML Considerations in Customer Engagement:* AML considerations will be integrated into customer relationship management, including conducting due diligence on customers and monitoring transactions for suspicious activities.

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*Balancing Customer Experience and Compliance:* A balance will be maintained between rigorous AML compliance and providing a seamless customer experience, ensuring that AML procedures do not unduly inconvenience legitimate customers.

## Performance Metrics and Reporting

*AML Performance Metrics:* Key performance indicators (KPIs) related to AML compliance will be developed and tracked, such as the effectiveness of transaction monitoring systems and the timely reporting of suspicious activities.

*Reporting AML Performance:* AML performance will be regularly reported to senior management and relevant stakeholders, providing insights into the contribution of AML efforts to the overall success and integrity of the business.

## Continuous Improvement and Adaptation

*Adapting to Market Changes:* AML strategies will be continuously adapted in response to changing market conditions, regulatory landscapes, and emerging risks.

*Feedback Loops:* Feedback loops will be established for the continuous refinement of AML policies based on operational experiences, audit findings, and changes in the business environment.

## CONCLUSION OF THE AML POLICY

As we conclude this comprehensive Anti-Money Laundering (AML) policy, it is imperative to reiterate the unwavering commitment of Credit Glorious Property Holdings Ltd. to uphold the highest standards of integrity and compliance in all its business dealings. Our AML policy is not merely a set of guidelines; it is a reflection of our core values and our dedication to playing a pivotal role in the global fight against financial crime.

## Commitment to Excellence and Compliance

We recognize that effective AML practices are fundamental to maintaining the trust of our customers, partners, and regulatory bodies. Our policy is designed to ensure rigorous compliance with all applicable laws and regulations, both within the UK and in the international jurisdictions where we operate. We are committed to continuously updating our policy to align with evolving legal standards and best practices in AML.

## Responsibility and Accountability

Our AML policy underscores the collective responsibility of every member of our organization. From senior management to individual employees, we all play a crucial role in implementing and adhering to these policies. The active involvement of our Compliance Officer and the unwavering support of our senior management are key to ensuring that these policies are effectively executed and maintained.

## Partnership and Collaboration

We believe in the power of collaboration – both internally within our organization and externally with our customers, partners, and regulatory bodies. By fostering open communication and encouraging a culture of

transparency and ethical conduct, we aim to strengthen our AML efforts and contribute to a safer financial environment.

## Continuous Improvement and Adaptation

In a world where financial crimes are constantly evolving, we are committed to staying ahead of the curve. This means not only being reactive to changes but also proactively seeking ways to enhance our AML strategies. Through continuous improvement, regular training, and the integration of advanced technologies, we aim to maintain a robust AML framework that is both effective and adaptable.

## Upholding Our Reputation and Integrity

Ultimately, our AML policy is integral to safeguarding the reputation and integrity of Credit Glorious Property Holdings Ltd. We are dedicated to conducting our business in a manner that reflects our commitment to legal compliance, ethical practices, and the prevention of money laundering and terrorist financing. In doing so, we not only protect our company but also contribute to the integrity of the global financial system.

As we move forward, Credit Glorious Property Holdings Ltd. will continue to uphold these principles, ensuring that our AML policy remains a living document, reflective of our dedication to excellence, compliance, and ethical business practices.