

## Anti-money laundering and Terrorist Financing Policy

### Purpose

Money laundering is the means by which the proceeds of crime (criminal property), however small, and the true ownership of that criminal property are changed so that the criminal property appears to come from a legitimate source. It also includes money, however come by, which is used to fund terrorism.

riskHive is required to comply with the Proceeds of Crime Act 2002, however we are not authorised or regulated by the Financial Conduct Authority. We therefore do not have to comply with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs), but it is considered best practice for us to do so.

As such, we have developed this policy and associated procedures to enable us to manage that risk effectively and to protect itself and its staff from being used to launder money and be used to further financial crime.

This policy applies to all personal data process by riskHive Software Solutions Ltd and riskHive Technical Services Ltd.

### Responsibilities

The **Managing Director** is responsible for:

- Reviewing, endorsing, and achieving this policy's aims.
- Ensuring ongoing compliance to this policy and is the appointed Money Laundering Reporting Officer (MLRO).
- As the appointed MLRO, is responsible for receiving, considering, and reporting as appropriate, disclosure of suspicious activity reporting by employees.

**riskHive employees** are responsible for:

- Carrying out their work in line with this policy and associated procedure (AML Procedure).
- Identifying any breaches of this policy and reporting them to the appointed MLRO.

### Requirements

To comply with the requirements of the Proceeds of Crime Act 2022 (**POCA**) the Terrorism Act 2002 (**TACT**) riskHive shall:

- Carry out an Anti-Money Laundering (AML) risk assessment.
- Maintain customer identification and due diligence procedures.
- Maintain adequate records of transactions.
- Take steps to ensure riskHive knows the identity of third parties it deals with and can identify and verify the identify of its customers and counterparties and confirm the legitimacy of funds being used for payment to riskHive.
- Provide training on the money laundering procedures that have been implemented to staff so that they understand their legal and regulatory responsibilities and their role in minimising the risk of riskHive being used to further money laundering.

### Signature and date



24.02.2024

*Sandu Hellings – Managing Director / Money Laundering Reporting Officer*