

EMKAP UK LTD

# Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy Statement

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## **1. INTRODUCTION**

This policy outlines EMKAP UK LTD's (hereinafter "We", the "Company" or "EMKAP UK",) commitment to preventing money laundering, terrorist financing, and other forms of financial crime. As a regulated firm authorised by the Financial Conduct Authority ("FCA"), EMKAP UK fully complies with its obligations under the UK Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended<sup>1</sup>), the Proceeds of Crime Act 2002<sup>2</sup>, the Sanctions and Anti-Money Laundering Act 2018<sup>3</sup>, and relevant FCA rules, including those in the SYSC and Financial Crime Guides<sup>4</sup>.

## **2. GOVERNANCE AND OVERSIGHT**

Responsibility for AML and KYC compliance lies with senior management. The firm has appointed a Money Laundering Reporting Officer (MLRO), the MLRO oversees the implementation of the firm's AML framework, including suspicious activity reporting, internal controls, and staff training. The Board maintains oversight of the firm's financial crime risk appetite and controls.

## **3. CUSTOMER DUE DILIGENCE (CDD)**

EMKAP UK applies risk-based customer due diligence measures in line with Regulation 27 of the Money Laundering Regulations. This includes verifying customer identity, understanding the nature and purpose of the business relationship, and identifying ultimate beneficial owners. Enhanced Due Diligence (EDD) is conducted for higher-risk clients, including politically exposed persons (PEPs), clients in high-risk jurisdictions, and those with complex structures.

## **4. ONGOING MONITORING AND RECORD KEEPING**

The firm conducts ongoing monitoring of business relationships to detect suspicious activity and ensure transactions align with the customer's risk profile. Records of CDD, risk assessments, and

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<sup>1</sup> [Money Laundering Regulations 2017 \(as amended\)](#)

<sup>2</sup> [Proceeds of Crime Act 2002](#)

<sup>3</sup> [Sanctions and Anti-Money Laundering Act 2018](#)

<sup>4</sup> [FCA Handbook: SYSC 6.3 and Financial Crime Guide](#)

transaction monitoring are retained for a minimum of five years in accordance with Regulation 40 of the Money Laundering Regulations.

## **5. SUSPICIOUS ACTIVITY REPORTING**

Employees are trained to identify and escalate unusual activity. The MLRO is responsible for reviewing internal reports and submitting Suspicious Activity Reports (SARs) to the National Crime Agency (NCA) where appropriate, in accordance with the Proceeds of Crime Act 2002 and the Terrorism Act 2000.

## **6. TRAINING AND AWARENESS**

All staff receive AML and KYC training on induction and annually thereafter. The training covers relevant laws, red flags, escalation procedures, and individual responsibilities. Attendance and completion are monitored and recorded.

## **7. POLICY REVIEW**

This policy statement is reviewed at least annually and updated as necessary to reflect changes in legislation, regulatory expectations, or the firm's risk profile.