



Anti-Money Laundering (AML) & Counter-Terrorism Financing (CTF) Policy

This document outlines AlphaInvest Limited's comprehensive approach to preventing money laundering, terrorist financing, and other illicit financial activities in compliance with global financial regulations and ethical standards.

1. Policy Statement

AlphaInvest Limited is fully committed to maintaining the highest standards of integrity and compliance with applicable AML/CTF laws and regulations. The company implements robust monitoring, reporting, and due diligence frameworks to detect and deter illegal financial activities.

2. Regulatory Compliance

AlphaInvest adheres to international standards including FATF Recommendations, EU Directives, and relevant local laws. All employees are trained to recognize and report suspicious activities in accordance with these standards.

3. Customer Due Diligence (CDD)

All clients must undergo thorough identity verification before accessing AlphaInvest services. Enhanced due diligence (EDD) applies to high-risk clients or transactions, ensuring ongoing monitoring throughout the customer relationship.

4. Record Keeping

AlphaInvest securely retains transaction and verification records for a minimum of five (5) years, in compliance with global regulatory obligations. Records are safeguarded against unauthorized access or alteration.

5. Reporting Obligations

Suspicious activity reports (SARs) are promptly submitted to relevant authorities whenever irregular transactions or activities are identified. Employees are obligated to maintain confidentiality throughout the reporting process.

6. Employee Training & Awareness

AlphaInvest conducts ongoing AML/CTF training to ensure all staff members remain knowledgeable about evolving threats, typologies, and compliance responsibilities. Training programs are reviewed annually for effectiveness.

7. Independent Audits

Regular internal and external audits are conducted to evaluate the adequacy of AML/CTF procedures. Identified gaps or deficiencies are immediately addressed through corrective actions and management oversight.

8. Non-Compliance Consequences

Any employee or client found in breach of AlphaInvest's AML/CTF policies may face disciplinary action, including suspension, termination, or legal prosecution as applicable under jurisdictional law.