



CGPH GROUP AML, CTF & FINANCIAL CRIME PREVENTION POLICY

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Applies to	All CGPH Group Companies
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1. Introduction

CGPH Group Ltd., all the affiliates and subsidiaries companies, are committed to maintaining the highest standards of integrity, transparency and regulatory compliance in every aspect of its business activities.

As an international group providing investment banking, corporate finance, financial advisory, private debt, structured finance, capital raising, tokenization and related financial services, the Group recognises its responsibility to prevent its businesses, services and professional relationships from being used to facilitate money laundering, terrorist financing, sanctions evasion, fraud or any other form of financial crime.

The prevention of financial crime is a fundamental component of the Group's governance framework and risk management strategy. Effective anti-money laundering controls protect not only the Group

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itself, but also its clients, counterparties, investors, regulators and the integrity of the financial markets in which it operates.

This Policy establishes the minimum standards applicable throughout the Group for identifying, assessing, managing and mitigating financial crime risks. Every individual acting on behalf of the Group is expected to contribute actively to maintaining an effective compliance culture.

This Policy shall be read together with the Group Risk Management Policy, Code of Ethics, Code of Conduct, Record Keeping Policy, Whistleblowing Policy, Data Protection Policy and all other relevant Group governance documents.

2. Purpose

The purpose of this Policy is to establish a comprehensive framework for preventing, detecting and managing risks associated with money laundering, terrorist financing and other financial crimes.

This Policy seeks to ensure that every Group Company conducts its activities in accordance with applicable laws, regulations and recognised international standards.

The Policy promotes a consistent and risk-based approach across the Group while recognising that individual jurisdictions may impose additional legal or regulatory requirements.

Through this Policy, the Group aims to protect its reputation, preserve the confidence of clients and counterparties, safeguard the integrity of financial markets and reduce legal, regulatory and operational risks arising from financial crime.

3. Scope

This Policy applies to every company belonging to the CGPH Group and to every director, officer, employee, consultant, contractor, advisor, intermediary, representative and any other individual acting for or on behalf of a Group Company.

The Policy applies to all products, services and business activities carried out by the Group, including but not limited to investment banking, financial advisory, mergers and acquisitions, private debt,

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structured finance, capital raising, investor relations, tokenization, real estate advisory, corporate finance and any ancillary services.

Where local legislation imposes stricter obligations than those contained in this Policy, the stricter requirements shall apply.

Nothing contained in this Policy shall limit any mandatory reporting obligations imposed by applicable law.

4. Definitions

For the purposes of this Policy:

- A. Money Laundering means any activity intended to conceal, disguise, convert, transfer or integrate the proceeds of criminal activity into the legitimate financial system.
- B. Terrorist Financing means the provision, collection or movement of funds or assets intended to support terrorist activities or terrorist organisations, regardless of whether the funds originate from lawful or unlawful sources.
- C. Financial Crime includes money laundering, terrorist financing, fraud, corruption, bribery, sanctions violations, tax evasion facilitation, market abuse, insider dealing, identity fraud and any other criminal conduct involving financial systems or economic activity.
- D. Customer Due Diligence (CDD) means the process of identifying and verifying clients, beneficial owners and relevant counterparties before establishing or maintaining a business relationship.
- E. Enhanced Due Diligence (EDD) means additional verification and monitoring measures applied where elevated financial crime risks have been identified.
- F. Beneficial Owner means the natural person who ultimately owns or controls a legal entity or on whose behalf a transaction is conducted.
- G. Politically Exposed Person (PEP) means an individual entrusted with prominent public functions, together with family members and close associates where required by applicable law.

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H. Sanctions means economic or financial restrictions imposed by competent national or international authorities.

5. Guiding Principles

The Group adopts a zero-tolerance approach towards money laundering, terrorist financing and other forms of financial crime.

Every business relationship shall be assessed with integrity, professional scepticism and appropriate due diligence.

Commercial considerations shall never override compliance obligations.

The Group shall not knowingly establish or maintain business relationships where unacceptable financial crime risks cannot be adequately mitigated.

The Group recognises that financial crime risks evolve continuously and therefore adopts a dynamic and risk-based approach to compliance.

All personnel are expected to contribute actively to maintaining effective AML controls and to cooperate fully with compliance reviews, investigations and regulatory requirements.

6. Risk-Based Approach

The Group applies a risk-based methodology to the identification, assessment and management of financial crime risks.

Risk assessments shall consider the nature of the client, beneficial ownership, geographical exposure, source of wealth, source of funds, products and services involved, delivery channels, transaction characteristics and any other factors relevant to the particular business relationship.

Higher-risk relationships shall receive enhanced scrutiny and more frequent monitoring.

Lower-risk relationships may be subject to simplified measures only where permitted by applicable law and where such treatment remains appropriate.

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Risk assessments shall not be regarded as static exercises but shall be reviewed periodically throughout the business relationship.

Where new information materially alters the financial crime risk profile of a client or transaction, the Group shall reassess the relationship without undue delay.

7. Customer Due Diligence

The Group shall perform appropriate Customer Due Diligence before establishing a business relationship or providing services where required by applicable law or internal procedures.

Customer Due Diligence shall seek to establish the identity of the client and verify that identity using reliable and independent sources.

Where the client is a legal entity, reasonable measures shall be taken to understand its ownership and control structure and to identify the ultimate beneficial owner.

The Group shall seek to understand the nature and purpose of the proposed business relationship and, where appropriate, obtain information regarding the client's business activities, expected transactions, source of wealth and source of funds.

No business relationship shall proceed where the Group is unable to obtain sufficient information to satisfy its due diligence requirements.

Personnel shall remain alert to inconsistencies, incomplete information, unusual behaviour or other circumstances that may indicate elevated financial crime risks.

Customer Due Diligence does not end once a client has been onboarded. The Group shall review client information periodically to ensure that records remain accurate, complete and appropriate for the level of risk presented by the relationship.

8. Enhanced Due Diligence

Where the Group identifies an elevated risk of money laundering, terrorist financing or other financial crime, Enhanced Due Diligence measures shall be applied before establishing or continuing the business relationship.

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Enhanced Due Diligence may be required where the client operates in high-risk jurisdictions, presents complex ownership structures, involves politically exposed persons, engages in unusually complex transactions or where any other circumstances indicate an increased level of financial crime risk.

Enhanced measures may include obtaining additional identification documents, verifying the source of wealth and source of funds, collecting supplementary information regarding the purpose of the business relationship, conducting independent background research and obtaining additional internal approvals. Business relationships presenting unacceptable levels of financial crime risk shall not be established or maintained.

9. Politically Exposed Persons

The Group recognises that business relationships involving Politically Exposed Persons may present increased financial crime risks.

Appropriate procedures shall be implemented to identify whether a client, beneficial owner or other relevant individual qualifies as a Politically Exposed Person under applicable legislation.

Where a Politically Exposed Person is identified, the Group shall perform Enhanced Due Diligence before establishing or continuing the relationship.

The Group shall seek to understand the individual's public function, source of wealth, source of funds and the purpose of the proposed business relationship.

Business relationships involving Politically Exposed Persons shall remain subject to enhanced ongoing monitoring throughout their duration.

10. Beneficial Ownership

The Group shall take reasonable measures to identify and verify the ultimate beneficial owners of legal entities with which it establishes business relationships.

Ownership structures shall be understood sufficiently to identify the natural persons who ultimately own or control the client.

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Where ownership structures are unusually complex, opaque or involve multiple jurisdictions, additional enquiries may be required before proceeding.

Where the Group is unable to establish beneficial ownership with an appropriate degree of certainty, the proposed relationship shall not proceed until satisfactory information has been obtained.

11. Sanctions Compliance

The Group is committed to complying with all applicable international sanctions, embargoes and restrictive measures imposed by competent authorities.

Appropriate sanctions screening shall be performed in accordance with applicable legal and regulatory requirements.

The Group shall not knowingly establish or continue relationships with individuals, entities or organisations subject to applicable sanctions where such relationships would violate applicable law.

Where a sanctions concern is identified, the matter shall be escalated immediately to Group Legal & Compliance for assessment.

Where required, transactions shall be suspended, rejected or reported in accordance with applicable legal obligations.

12. Ongoing Monitoring

The Group shall maintain ongoing monitoring procedures throughout the duration of every business relationship.

Monitoring activities shall be proportionate to the level of financial crime risk presented by the client.

Personnel shall remain alert to unusual transaction patterns, unexpected changes in client behaviour, inconsistencies in documentation, significant changes in ownership, unusual payment structures or any other activity that may indicate elevated financial crime risk.

Client information shall be updated periodically to ensure that Customer Due Diligence records remain accurate and complete.

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Where material changes occur during the relationship, additional due diligence measures shall be performed where appropriate.

13. Suspicious Activity Reporting

Every individual acting on behalf of the Group has a responsibility to report any activity that may reasonably give rise to suspicion of money laundering, terrorist financing or other financial crime.

Reports shall be made promptly through the Group's internal reporting procedures.

Personnel shall not attempt to investigate suspicious activity independently unless specifically authorised to do so.

The existence of suspicion does not require proof that criminal conduct has occurred.

Where required by applicable law, the Group shall submit reports to the appropriate competent authorities within the applicable legal timeframes.

The confidentiality of internal reports shall be maintained throughout the reporting and assessment process.

14. Prohibition of Tipping-Off

Personnel shall not disclose to any client, counterparty or third party that a suspicious activity report has been made or that an investigation is being conducted where such disclosure is prohibited by applicable law.

The prohibition of tipping-off applies regardless of whether an internal or external investigation is ongoing.

Improper disclosure may prejudice investigations and expose both the individual and the Group to legal or regulatory consequences.

Where uncertainty exists regarding communications with a client during an ongoing assessment, guidance shall be obtained from Group Legal & Compliance before any information is disclosed.

15. Record Keeping

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The Group shall maintain appropriate records relating to Customer Due Diligence, Enhanced Due Diligence, sanctions screening, transaction monitoring, internal assessments, suspicious activity reports and any other documentation required to demonstrate compliance with applicable AML obligations.

Records shall be retained securely for the period required by applicable law and the Group Record Keeping Policy.

Access to AML records shall be restricted to authorised personnel with a legitimate business need.

Records shall remain accurate, complete and readily available for regulatory inspection, audit or lawful requests from competent authorities.

16. Internal Controls

The Group shall maintain an effective system of internal controls designed to prevent, detect and manage financial crime risks.

Internal controls shall be proportionate to the nature, scale and complexity of the Group's activities and shall be reviewed periodically to ensure their continued effectiveness.

The Group shall maintain appropriate governance arrangements, segregation of duties, approval procedures and reporting mechanisms to support compliance with applicable AML, CTF and financial crime requirements.

Internal controls shall be designed to identify weaknesses, facilitate timely corrective action and promote continuous improvement throughout the Group.

17. Roles and Responsibilities

The prevention of financial crime is the responsibility of every individual acting on behalf of the Group:

1. The Board of Directors is responsible for approving this Policy and overseeing the effectiveness of the Group's AML and Financial Crime Prevention Framework.
2. Senior Management shall ensure that adequate resources, procedures and internal controls are implemented within their respective areas of responsibility.

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3. Managers shall promote a culture of compliance, ensure that personnel understand their obligations and promptly escalate matters requiring specialist review.
4. Group Legal & Compliance shall oversee the implementation of this Policy, provide guidance regarding financial crime risks, support due diligence activities, coordinate internal assessments and monitor compliance with applicable legal and regulatory requirements.
5. Personnel shall comply with this Policy, perform appropriate due diligence, report suspicious activity and cooperate fully with internal reviews, audits and investigations.

18. Third-Party Relationships

The Group recognises that third parties may expose the organisation to financial crime risks if appropriate due diligence is not performed.

Reasonable due diligence shall be conducted before entering into significant relationships with intermediaries, introducers, consultants, professional advisers, service providers, joint venture partners and other relevant counterparties.

The level of due diligence shall reflect the nature of the proposed relationship and the level of financial crime risk presented.

Where appropriate, contractual arrangements shall require third parties to comply with applicable AML, CTF, sanctions and financial crime legislation.

Relationships with third parties shall be reviewed periodically throughout their duration.

19. Training and Awareness

The Group is committed to maintaining a strong culture of compliance through appropriate education and awareness.

Personnel shall receive appropriate AML, CTF and Financial Crime Prevention training consistent with their responsibilities and the nature of their activities.

Training programmes shall seek to promote awareness of emerging financial crime risks, evolving regulatory expectations, internal procedures and recognised best practices.

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Managers shall encourage continuous learning and ensure that personnel remain aware of their obligations under this Policy.

20. Independent Review and Monitoring

The effectiveness of the Group's AML and Financial Crime Prevention Framework shall be reviewed periodically.

Reviews may consider the adequacy of internal controls, risk assessments, due diligence procedures, transaction monitoring arrangements, record keeping practices, training programmes and reporting mechanisms.

Recommendations arising from internal reviews, audits, regulatory inspections or lessons learned from previous incidents shall be considered by management and implemented where appropriate.

The objective of independent review is to support continuous improvement and strengthen the Group's overall governance framework.

21. Cooperation with Competent Authorities

The Group is committed to cooperating fully with competent regulatory, judicial and law enforcement authorities within the limits of applicable law.

Information requests received from competent authorities shall be handled promptly, professionally and in accordance with applicable legal requirements.

Personnel shall not obstruct lawful investigations or regulatory enquiries.

Any communication with competent authorities relating to financial crime matters shall be coordinated through Group Legal & Compliance unless otherwise required by law.

22. Breaches of this Policy

Failure to comply with this Policy may expose the Group to significant legal, regulatory, financial and reputational risks.

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Any breach of this Policy may result in disciplinary action, contractual consequences, termination of employment or engagement, reporting to competent authorities or other measures considered appropriate by the Group.

Intentional participation in money laundering, terrorist financing, sanctions evasion, fraud or any other financial crime shall be regarded as serious misconduct and may result in criminal prosecution where applicable.

Knowingly failing to report suspicious activity, deliberately circumventing due diligence procedures or providing false or misleading information during compliance reviews may also constitute serious breaches of this Policy.

23. Review

This Policy shall be reviewed at least annually or whenever significant changes occur in applicable legislation, regulatory expectations, international standards, the Group's activities or its overall financial crime risk profile.

Material amendments shall be approved by the Board of Directors of CGPH Group Ltd.

Group Legal & Compliance shall monitor developments in applicable laws, international guidance and recognised best practices to ensure that this Policy remains effective and appropriate.

24. Final Provisions

The prevention of money laundering, terrorist financing and other forms of financial crime is fundamental to the integrity, reputation and long-term success of CGPH Group.

Every individual acting on behalf of the Group has a responsibility to support this objective through professional judgement, responsible conduct and full compliance with applicable laws and internal policies.

By maintaining effective governance, robust due diligence procedures, appropriate internal controls and a strong culture of compliance, the Group seeks to protect its clients, counterparties, investors, employees and the financial system as a whole from the risks associated with financial crime.

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This Policy establishes the minimum standards applicable throughout the Group and reflects CGPH Group's commitment to conducting its business with integrity, transparency and the highest standards of professional and regulatory compliance.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

Signature: _____

Name: Kolyo Boichev

Title: Director

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