

Information on Anti-Money Laundering and Terrorist Financing at Winterflood Securities Limited

Winterflood Securities Limited confirms that it has implemented an anti-money laundering policy and procedure framework designed to comply with all applicable anti-money laundering laws and regulations, including sanctions regulations. This AML policy provides for:

- The appointment of a Money Laundering Reporting Office (MLRO) of sufficient seniority who has responsibility for oversight of the firm's compliance with relevant legislation, regulations, rules, and industry guidance;
- A risk based approach towards assessing and managing the money laundering and terrorist financing risks to the firm;
- A risk-based programme for customer due diligence, identification, verification, and know your customer (KYC) procedures;
- A New Client Committee and a Business Approval Committee to approve new clients; the MLRO is a member of both.
- Ongoing monitoring of client activity, including real-time market surveillance;
- Internal procedures for reporting suspicious activities and suspicious transactions to the relevant authorities; and
- Appropriate communications, internal controls, audit, and monitoring to ensure that the firm's policies and procedures are understood and complied with in practice.

The Compliance department can be reached at compliance@winterflood.com should you require any additional information.
