



EFFORTLESSWEALTHGROUP LIMITED

ANTI-MONEY LAUNDERING (AML) POLICY

LAST UPDATED: 04 APRIL 2025

ISSUING PARTY

RECEIVING PARTY

EFFORTLESSWEALTHGROUP LIMITED

EWG MEMBERS

Introduction

This Anti-Money Laundering (AML) Policy (Policy) is issued by **EFFORTLESSWEALTHGROUP LIMITED** (collectively, “EffortlessWealthGroup”, “EWG”, “We”, “Us” or “Our”), a **Private Investment Club**, incorporated in England and Wales under company number **16252357**, operating within the Standard Industrial Classification (SIC) code: **94990**: Activities of Other Membership Organizations, whose registered office is **3rd Floor, 86-90 Paul Street, London, England, EC2A 4NE**.

This Policy is issued to: **Members** of EWG defined as an individual who owns an **approved** EWG Membership Account.

01. Overview

- 1.1. EWG is committed to preventing the misuse of its services for money laundering or terrorist financing activities. This policy outlines the responsibilities and processes EWG adheres to, in compliance with regulatory standards and best practices.
- 1.2. The Anti-Money Laundering (AML) Policy at EWG is a critical component of our internal compliance measures. This policy is designed to prevent the laundering of funds obtained through illegal activities. Our AML practices adhere to widely recognized standards and comply with regulatory requirements applicable to financial institutions, ensuring that EWG operates with integrity and transparency in all financial dealings.

02. Objective

- 2.1. The AML Policy of EWG aims to:
 - 2.1.1. Prevent criminal elements from utilizing EWG for money laundering or terrorist financing.
 - 2.1.2. Enable EWG to effectively manage and mitigate associated financial and reputational risks.

- 2.1.3. Ensure compliance with applicable legal and regulatory requirements.

03. Scope of Application

- 3.1. This policy applies to all members, employees, and partners of EWG. It covers all operations and transactions that could potentially be used for illegal purposes, emphasizing the importance of vigilance and compliance across all activities.

04. AML Compliance Structure

- 4.1. AML Compliance Officer: An appointed AML Officer oversees the implementation of AML procedures, ensuring compliance across all levels of the organization.
- 4.2. Member Identification Procedures (KYC): Comprehensive Know Your Client (KYC) processes are in place to accurately identify and verify the identity of members and their sources of funds.
- 4.3. Reporting Obligations: EWG adheres to strict reporting requirements for any suspicious activities, cooperating fully with regulatory and law enforcement bodies as necessary.
- 4.4. Cashless Transactions: EWG does not engage in cash transactions nor opens deposit accounts; all Member contributions are processed through cashless settlements. EWG maintains stringent records of all Member transactions to ensure transparency and regulatory compliance. Additionally, EWG reserves the right to halt any fund transfers if there is suspicion of illicit activities. In such instances, EWG is obligated to report suspicious activities to the relevant regulatory authorities without prior notification to the involved parties. This protocol is in place to uphold the integrity of all operations within our Private Investment Club.

05. Member Due Diligence

- 5.1. Risk-Based Approach: EWG employs a risk-based approach to monitor and manage the risks associated with each member, adjusting scrutiny levels based on the risk profile.
- 5.2. Enhanced Due Diligence: For high-risk categories, enhanced due diligence measures are

undertaken to ensure a deeper understanding of Member activities and fund sources.

06. Monitoring and Reporting

- 6.1. Continuous Monitoring: Transaction monitoring systems are in place to detect unusual patterns of activity that may signify money laundering or terrorist financing.
- 6.2. Suspicious Activity Reporting: EWG has mechanisms to report suspicious activities to appropriate authorities without delay, ensuring legal compliance and mitigating potential risks.

07. Training and Awareness

- 7.1. Regular Training: All employees receive regular training on AML regulations and the latest trends in financial crime to ensure they remain vigilant and informed.
- 7.2. Awareness Programs: EWG conducts awareness programs to educate members about the risks of money laundering and the importance of compliance with AML policies.

08. Review and Update of AML Policy

- 8.1. Regular Reviews: The AML policy is reviewed regularly to capture changes in legislation, emerging risks, and operational adjustments.
- 8.2. Policy Updates: We may update our AML Policy from time to time. Any changes we make to our AML Policy in the future will be updated on this page with the 'Last Updated' date amended and, where appropriate, we will notify you by post or email.

09. Record Keeping

- 9.1. Document Retention: All records related to financial transactions and Member verifications are retained for a minimum period as prescribed by law, ensuring that information is available for investigative or audit purposes.

END OF ANTI-MONEY LAUNDERING (AML) POLICY
