

Anti-Money Laundering & Counter-Terrorist Financing Policy

(MLRs 2017 Compliant)

March 26

1. Policy Statement

Connexion Developments Ltd is committed to preventing money laundering, terrorist financing, and the misuse of funds within its business operations.

We comply with the **Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLRs 2017)** and take a risk-based approach to ensure that our products, services, and financial transactions are not used for unlawful purposes.

2. Scope

This policy applies to:

- All employees, directors, and contractors
- All business transactions (UK and international)
- All customers, suppliers, and third-party partners

3. Risk Profile

Connexion Developments Ltd operates as a **B2B engineering and industrial equipment supplier**, with relatively low inherent AML risk. However, specific risk areas include:

- International trade and exports
- New or unknown overseas customers
- High-value or unusual transactions
- Requests involving complex payment structures
- Transactions involving high-risk jurisdictions

4. Customer Due Diligence (CDD)

We apply proportionate due diligence measures:

Standard Due Diligence

- Verify customer identity (company name, registration, address)
- Confirm business activity is consistent with purchase
- Validate contact details and payment source

Enhanced Due Diligence (EDD) (when required)

Applied where higher risk is identified:

- New overseas customers in higher-risk regions
- Unusual order patterns or payment requests
- Requests for third-party payments or redirection

EDD may include:

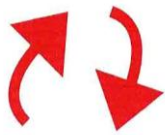
- Additional company verification (e.g. website, trading history)
- Director/ownership checks
- Request for formal documentation

5. Transaction Monitoring

We monitor transactions for indicators such as:

- Unusual order volumes or inconsistent product use
- Requests for split payments or multiple payers
- Payments from unrelated third parties
- Urgent requests with no commercial logic

Any concerns are escalated internally.



6. Prohibited Activities

Connexion Developments Ltd will not:

- Accept anonymous payments
- Accept unexplained third-party payments
- Engage in transactions designed to obscure origin of funds
- Supply goods where there is suspicion of unlawful use

7. Reporting & Escalation

Employees must report any suspicious activity to management immediately.

Where appropriate:

- Transactions will be paused or refused
- Further checks will be conducted
- Reports may be made to relevant authorities (e.g. National Crime Agency)

8. Record Keeping

We retain records of:

- Customer verification checks
- Transaction data
- Communications relating to due diligence

Records are kept in line with UK legal and accounting requirements.

9. Staff Awareness

- Staff involved in sales, accounts, and purchasing are expected to remain vigilant
- Basic awareness of AML risks is maintained internally
- Escalation routes are clearly defined

10. Responsibility

Overall responsibility lies with:

- Managing Director (Mike Freye)
- Senior management team

11. Review

This policy will be reviewed periodically and updated in line with:

- Regulatory changes
- Business risk profile changes

Approved by:

Managing Director

For and on behalf of Connexion Developments Ltd