

Anti-Money Laundering (AML) Policy



1. Introduction

Skydatasol Ltd (“the Company”) and its subsidiaries are committed to conducting all business activities in compliance with applicable laws and regulations designed to prevent money laundering, terrorist financing, and financial crime. This Anti-Money Laundering (AML) Policy sets out the principles, responsibilities, and procedures adopted by the Company to mitigate the risks associated with illicit financial activity. The Policy applies to all employees, directors, subsidiaries, contractors, and third-party partners engaged in business with the Company.

2. Legal and Regulatory Framework

The Company operates in accordance with the UK Proceeds of Crime Act 2002, the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017, the Terrorism Act 2000, and any amendments or guidance issued by the UK Financial Conduct Authority (FCA) and the Joint Money Laundering Steering Group (JMLSG). Where subsidiaries or projects operate internationally, the Company ensures compliance with equivalent local legislation and global standards, including the recommendations of the Financial Action Task Force (FATF).

3. Policy Statement

The Company will take all reasonable steps to prevent its services, subsidiaries, and financial structures from being used for money laundering or terrorist financing purposes. It will maintain robust internal controls, reporting mechanisms, and employee training to detect and deter suspicious activity. The Company recognises that reputational integrity, investor confidence, and regulatory compliance depend upon rigorous adherence to AML standards.

4. Customer Due Diligence (CDD)

The Company shall conduct thorough customer due diligence on all clients, investors, and counterparties before entering into business relationships. This process includes verifying identity, assessing the legitimacy of funds, and evaluating beneficial ownership. For higher-risk customers or transactions, enhanced due diligence will be performed, including closer scrutiny of source of wealth, source of funds, and political exposure.

The Company will not establish a relationship or carry out a transaction until customer verification has been satisfactorily completed. Where verification is not possible, the Company reserves the right to terminate or refuse the relationship.

5. Monitoring and Record Keeping

Ongoing monitoring of transactions is carried out across all subsidiaries to identify unusual patterns or activities inconsistent with the expected profile of the client or partner. Monitoring systems are risk-based and proportionate, with escalation procedures for suspicious or irregular behaviour.

Records of customer identification, due diligence documents, and transaction data are retained for a minimum of five years from the end of the business relationship, in accordance with legal requirements. These records remain confidential but may be made available to regulators and law enforcement upon lawful request.

6. Reporting of Suspicious Activity

All employees, contractors, and directors have a responsibility to remain vigilant for any indicators of money laundering or terrorist financing. Where a suspicion arises, it must be reported immediately to the Company's appointed Money Laundering Reporting Officer (MLRO).

The MLRO will assess the report and, if appropriate, file a Suspicious Activity Report (SAR) with the National Crime Agency (NCA) or the relevant regulatory authority. The MLRO also maintains a register of reports and outcomes for governance oversight.

Employees are reminded that disclosure of suspicion to the subject of an investigation ("tipping off") is a criminal offence under UK law.

7. Responsibilities and Governance

The Board of Directors retains ultimate responsibility for AML compliance across Skydatasol Holdings Ltd and its subsidiaries. The MLRO is appointed at the Group level

to oversee policy implementation, reporting, and compliance audits. Subsidiaries are required to appoint AML compliance officers who report to the Group MLRO.

Managers are responsible for ensuring that staff under their supervision understand and comply with the Policy. All employees are responsible for following AML procedures and raising concerns without delay.

8. Training and Awareness

The Company provides mandatory AML training to all relevant employees and contractors at the commencement of their engagement and on an annual basis thereafter. Training covers legal obligations, detection of suspicious behaviour, escalation processes, and practical case studies. Employees in high-risk areas such as financial services, security, and client onboarding receive enhanced training.

Compliance testing of knowledge may be conducted to ensure training effectiveness, and attendance records are maintained for regulatory audit purposes.

9. Risk-Based Approach

The Company applies a risk-based approach to AML, recognising that different business lines carry different exposure levels. Higher-risk sectors such as security contracts, international logistics, and financial services are subject to enhanced controls and transaction monitoring. Lower-risk activities remain covered by standard due diligence and oversight.

The risk-based approach is reviewed annually, with adjustments made to reflect changes in the business model, customer base, or global financial crime threats.

10. Enforcement and Disciplinary Measures

Failure to comply with this Policy or AML regulations will be treated as a serious breach of employment or contractual obligations. Employees or partners found complicit in money laundering, or negligent in their duties, may face disciplinary action up to and including termination of employment, contract cancellation, and referral to law enforcement.

11. Review and Continuous Improvement

This Policy is reviewed annually by the Board of Directors and updated in line with legal developments, regulatory guidance, and evolving best practices. The MLRO provides quarterly compliance reports to the Board, ensuring transparency and accountability.

Conclusion

The Anti-Money Laundering Policy of Skydatasol Ltd reinforces the Group's commitment to ethical conduct, investor trust, and legal compliance. By embedding strict controls, continuous monitoring, and a culture of accountability, the Company seeks not only to comply with regulatory requirements but also to establish itself as a trusted partner in all business transactions.



Dr Francesco Dergano