# Anti-Money Laundering (AML) Policy

Audax International Ltd

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| Company | Audax International Ltd |
| Document Title | Anti-Money Laundering Policy |
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| Approved By | M Heffer, W Durrant, S Andrews |

### 1. Policy Statement

Audax International Ltd is committed to preventing money laundering and terrorist financing in all aspects of its operations. The company maintains a zero-tolerance approach to financial crime and ensures that all business activities are conducted with integrity, transparency, and accountability.

### 2. Legal and Regulatory Framework

This policy aligns with the UK Money Laundering Regulations 2017 (as amended), the Proceeds of Crime Act 2002 (POCA), and applicable international anti-money laundering standards relevant to government contracting and overseas operations.

### 3. Scope

This policy applies to all employees, directors, consultants, contractors, and third parties acting on behalf of Audax International Ltd, including international assignments.

**4. Risk-Based Approach**

Audax International Ltd adopts a risk-based approach to identifying and mitigating money laundering risks, particularly in relation to international engagements, government clients, and cross-border payments.

**5. Customer and Client Due Diligence**

The company undertakes appropriate due diligence on clients, partners, and counterparties to verify identity, legitimacy, and source of funds where relevant.

**6. Prohibited Activities**

The company prohibits engagement in any activity that facilitates money laundering, including knowingly accepting proceeds of crime, concealing illicit funds, or participating in suspicious financial arrangements.

**7. Reporting Suspicious Activity**

All personnel must report any knowledge or suspicion of money laundering immediately to a designated senior manager. Where appropriate, reports may be escalated to relevant authorities in accordance with legal obligations.

**8. Record Keeping**

The company maintains appropriate records of due diligence, financial transactions, and decision-making processes in line with regulatory requirements.

**9. Training and Awareness**

Audax International Ltd provides appropriate training and guidance to ensure personnel understand money laundering risks and their responsibilities under this policy.

**10. Responsibilities**

Senior management are responsible for implementation and oversight. All personnel must comply with this policy and report concerns promptly.

**11. Monitoring and Review**

This policy will be reviewed periodically to ensure ongoing effectiveness and compliance with evolving legal and regulatory requirements.

**12. International Operations**

When operating internationally, the company will consider local AML risks and ensure compliance with both UK law and applicable local regulations.