AML & KYC POLICY SUMMARY

Anti-Money Laundering & Know-Your-Client Framework

Effective Date: 15 June 2026
Last Updated: 1 June 2026

1. Purpose

Rexwood Capital maintains a risk-based Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), and sanctions compliance framework across its affiliated entities and investment structures.

This Policy Summary outlines the identification, verification, monitoring, and reporting standards applied in accordance with applicable local laws, international AML standards, and cross-border regulatory obligations.

2. Client Identification & Verification

Prior to establishing any investment mandate or capital participation arrangement, all prospective clients must complete formal identification and verification procedures.

Verification may include, where applicable:

- Government-issued identification
- Proof of residential address
- Corporate incorporation documentation (for legal entities)
- Beneficial ownership declarations
- Director and shareholder identification
- Tax residency declarations
- Authorized signatory verification

No investment relationship will commence until identity verification requirements have been satisfied and internal compliance approval has been granted.

3. Beneficial Ownership & Control

Rexwood Capital requires disclosure of ultimate beneficial ownership for all legal entities and complex structures.

Engagement will not proceed where:

- Ownership transparency is insufficient
- Beneficial owners cannot be satisfactorily identified
- Ownership structures indicate elevated regulatory risk

Clients may be required to provide additional documentation to verify direct or indirect ownership and control.

4. Source of Funds & Source of Wealth

Clients may be required to provide documentation evidencing:

- Source of funds
- Source of wealth
- Business activities
- Asset ownership
- Transaction history (where appropriate)

Rexwood Capital reserves the right to request enhanced documentation where necessary to establish legitimacy of capital.

Failure to provide satisfactory evidence may result in rejection, suspension, or termination of engagement.

5. Risk-Based Assessment

Each client is subject to a documented risk-based assessment considering factors including:

- Jurisdiction of residence or incorporation
- Politically Exposed Person (PEP) status
- Sanctions exposure
- Industry sector
- Transaction profile
- Structural complexity
- Cross-border exposure

Enhanced due diligence (EDD) may be applied to higher-risk clients.

6. Sanctions & Screening

Rexwood Capital conducts sanctions and watchlist screening against applicable frameworks, including but not limited to:

- Sanctions administered by the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury
- United Kingdom sanctions regime
- European Union restrictive measures
- United Nations Security Council sanctions

Engagement will not proceed where:

- A client or beneficial owner appears on an applicable sanctions list
- A client is directly or indirectly owned or controlled (50% or more) by a sanctioned person or entity
- Capital is derived from sanctioned jurisdictions or sanctioned financial institutions
- There is reasonable suspicion of illicit activity

Rexwood Capital reserves the right to decline or terminate engagement without disclosure of internal compliance findings where legally permitted.

7. Ongoing Monitoring

AML, CTF, and sanctions obligations continue throughout the client relationship.

Rexwood Capital may conduct ongoing monitoring, including:

- Periodic documentation refresh
- Transaction review
- Re-verification of identity
- Sanctions re-screening
- Risk reclassification

Clients may be required to provide updated documentation upon request.

Failure to cooperate may result in suspension or termination of services.

8. Suspicious Activity & Regulatory Reporting

Where suspicious activity is identified, Rexwood Capital may:

- Conduct internal investigation
- Restrict or suspend account activity
- Freeze capital allocations where legally required
- File regulatory or statutory reports
- Terminate engagement

Disclosure to the client may be restricted in accordance with applicable law.

9. Refusal & Termination Rights

Rexwood Capital reserves the absolute right to:

- Refuse onboarding
- Suspend services
- Terminate a mandate
- Decline transactions

where AML/KYC standards are not satisfied or where regulatory, sanctions, or compliance concerns arise.

No liability shall arise from refusal, restriction, or termination made in good faith compliance with AML/CTF obligations.

10. Data Handling & Information Sharing

Information collected for AML/KYC purposes may be shared with:

- Affiliated entities
- Compliance service providers
- Legal advisors
- Regulatory or governmental authorities where required

All information is handled in accordance with the Privacy & Data Protection Policy.

11. Jurisdictional Application

AML/KYC procedures are conducted in accordance with:

- Applicable local laws
- International AML standards
- Cross-border compliance requirements
- Entity-specific regulatory frameworks

Specific regulatory requirements may vary by affiliated entity and jurisdiction.

12. No Guarantee of Acceptance

Submission of documentation does not guarantee acceptance as a client.

Engagement remains subject to internal compliance review and final approval.