

# Anti-Money Laundering (AML) Policy

LOS Digital Ltd | April 2026

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## 1. Purpose

LOS Digital Ltd is committed to preventing money laundering and terrorist financing. This policy sets out our responsibilities and the measures we take to comply with the Proceeds of Crime Act 2002, the Terrorism Act 2000, and the Money Laundering, Terrorist Financing and Transfer of Funds (Amendment) (EU Exit) Regulations 2019.

## 2. Scope

This policy applies to all directors, contractors, and third parties acting on behalf of LOS Digital Ltd.

## 3. Our Commitment

LOS Digital Ltd will not knowingly engage in, facilitate, or assist with any transaction that constitutes or forms part of money laundering or terrorist financing activity.

## 4. Risk Assessment

As a two-director web design, development, and custom software company, our primary risk exposure is through payments received for services. We do not handle cash transactions and operate exclusively with verified business clients. We conduct appropriate due diligence proportionate to the identified risk level.

## 5. Customer Due Diligence (CDD)

Before entering into a business relationship, we will verify the identity of new clients using reliable, independent source documents. We will monitor ongoing business relationships for unusual or suspicious activity.

## 6. Suspicious Activity Reporting

Any director who knows or suspects that money laundering is taking place must report this to the other director immediately. Where required, reports will be submitted to the National Crime Agency (NCA) via the Suspicious Activity Reports (SARs) online portal. The nominated Money Laundering Reporting Officer (MLRO) is Luke Murray.

## 7. Record Keeping

We will retain records of all due diligence undertaken and transactions for a minimum of five years in accordance with regulatory requirements.

## 8. Training

Both directors will maintain awareness of AML obligations and keep up to date with relevant regulatory guidance.

## **9. Policy Review**

This policy will be reviewed annually or following any significant regulatory changes.

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**LOS Digital Ltd**

**Date:** April 2026    **Review date:** April 2027