



Anti-Money Laundering and Counter Terrorist Financing Policy

1. Purpose

Language Reach Limited is committed to conducting business lawfully, ethically and with integrity. We do not knowingly engage in, support, or facilitate money laundering, terrorist financing, or any other financial crime.

2. Scope

This policy applies to all employees, directors, contractors, freelancers, agents and any other persons acting on behalf of Language Reach Limited.

3. Policy Statement

Language Reach Limited adopts a zero-tolerance approach to money laundering and terrorist financing. We are committed to taking reasonable and proportionate steps to prevent our business from being used for any criminal financial activity.

4. Our Approach

We seek to reduce financial crime risk by:

- carrying out reasonable checks on clients, suppliers and counterparties where appropriate
- reviewing unusual or high-risk transactions or payment requests
- maintaining accurate financial and business records
- escalating concerns internally where suspicious activity is identified
- refusing to proceed with transactions where concerns cannot be resolved appropriately

5. Red Flags

Examples of concerns may include:

- unusual payment arrangements or requests
- payments from or to third parties without clear justification
- inconsistent client or company details

- pressure to complete transactions urgently without proper checks
- transactions that appear to have no clear commercial purpose

6. Reporting Concerns

Any employee or representative who becomes aware of suspicious activity, or has concerns relating to money laundering or terrorist financing, must report the matter immediately to management for review.

7. Breaches

Any breach of this policy may result in disciplinary action, termination of contract, or other appropriate action. Where necessary, matters may be reported to the relevant authorities.

8. Responsibility and Review

Management is responsible for the implementation and periodic review of this policy and for ensuring that appropriate controls remain in place.