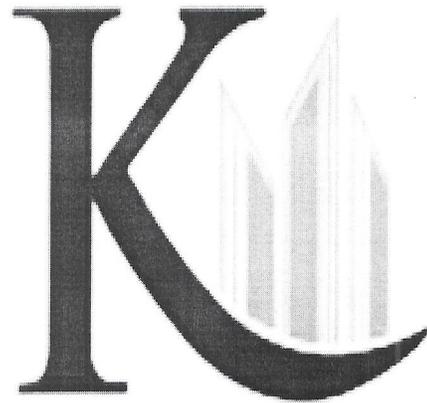


KENTARO MUGERWA & CO.
Advocates Solicitors and Consultants



KENTARO MUGERWA & CO.
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ANTI - MONEY LAUNDERING POLICY.

Kentaro Mugerwa & Co. Advocates.

Apt 3 Block A Plot 1A1-7A1

P.O. Box 1176,

Robert Mugabe Road

Mbuya-Kampala.

1. INTRODUCTION.

Kentaro Mugerwa & Co. Advocates is committed to preventing its services from being used for money laundering, terrorist financing, or other financial crimes. The Firm shall adhere to all applicable laws, regulations, and guidelines in Uganda, including the Anti-Money Laundering Act cap 118 and ensure that all staff are aware of their responsibilities in detecting and preventing illicit financial activities.

The Firm maintains a zero-tolerance approach to money laundering and any related illegal activities.

2. PURPOSE.

The purpose of this policy is to:

- Establish clear procedures to detect and prevent money laundering and terrorist financing.
- Ensure compliance with national Anti-Money Laundering laws and international best practices.
- Protect the Firm, its employees, and clients from involvement in financial crimes.
- Promote a culture of integrity, transparency, and accountability.

3. SCOPE.

This policy applies to:

- i) All partners, employees, consultants, and agents of the Firm.
- ii) All services provided by the Firm, including legal advisory, representation, and financial transactions on behalf of clients.

4. LEGAL AND REGULATORY FRAMEWORK.

The Firm shall comply with:

- i) Anti-Money Laundering Act cap 118.
- ii) Financial Intelligence Authority (FIA) Regulations and Guidelines

Any other relevant local or international Anti-Money Laundering regulations applicable to legal service providers.



5. ROLES AND RESPONSIBILITIES.

a) **Management.**

- Implement and monitor compliance with this Anti-Money Laundering Policy.
- Appoint a Compliance Officer / Money Laundering Reporting Officer (MLRO) responsible for overseeing Anti-Money Laundering procedures.
- Ensure adequate resources, training, and systems for Anti-Money Laundering compliance.

b) **MLRO / Compliance Officer.**

- Monitor transactions and client relationships for suspicious activity.
- Maintain records of reports submitted to the Financial Intelligence Authority (FIA).
- Conduct internal audits and risk assessments related to Anti- Money Laundering compliance.

c) **Employees and Partners.**

- Identify and report suspicious transactions promptly to the MLRO.
- Follow all Anti-Money Laundering procedures and complete required training.
- Maintain client confidentiality while reporting suspicious activities in accordance with the law.

6. CLIENT DUE DILIGENCE (CDD).

Before engaging a new client or executing certain transactions, the Firm shall conduct due diligence including:

- Verification of the client's identity using reliable documentation.
- Identification of beneficial owners for corporate clients.
- Assessing the purpose and intended nature of the client relationship.
- Conducting enhanced due diligence for high-risk clients or transactions (e.g., politically exposed persons, cross-border transactions, complex structures).

7. RECORD KEEPING.

The Firm shall maintain records of:

- Client identification documents and verification checks.
- Transactions and services rendered.
- Internal reports of suspicious activity and reports submitted to the FIA.



- Records shall be retained for a minimum of 10 years, in compliance with Ugandan law.

8. REPORTING SUSPICIOUS ACTIVITIES.

Employees must report any suspicious transactions or behavior to the MLRO immediately.

The MLRO is responsible for:

- Investigating reported activities.
- Filing Suspicious Transaction Reports (STRs) with the Financial Intelligence Authority (FIA).
- Maintaining confidentiality in line with legal requirements.
- Failure to report suspicious activities may result in disciplinary action, including termination.

9. TRAINING AND AWARENESS.

All staff shall receive mandatory Anti-Money Laundering training during on-boarding and regular refresher sessions.

Training shall cover:

- Recognizing suspicious transactions.
- Customer due diligence procedures.
- Legal obligations under Ugandan Anti-Money Laundering laws.
- Reporting mechanisms

10. RISK ASSESSMENT.

The Firm shall periodically assess:

- Risks associated with client types, sectors, and jurisdictions.
- The risk of money laundering or terrorist financing through Firm services.
- Effectiveness of existing Anti-Money Laundering controls and procedures.

Based on the assessment, appropriate mitigation measures shall be implemented.

11. CONFIDENTIALITY.

All Anti-Money Laundering related information and reports must be treated as confidential. Disclosure is permitted only to authorized personnel or as required by law.



12. COMPLIANCE AND ENFORCEMENT.

Non-compliance with this policy may result in disciplinary action, including:

- Written warnings.
- Suspension.
- Termination of employment.
- Reporting to regulatory authorities as mandated by law

The Firm reserves the right to refuse or terminate client relationships where Anti-Money Laundering compliance cannot be ensured.

13. MONITORING AND REVIEW.

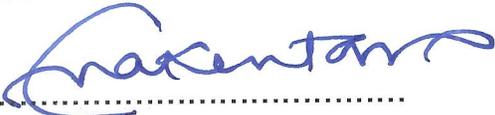
The Firm shall review this Anti-Money Laundering Policy annually or as needed to ensure compliance with new laws, regulations, or identified risks. Regular audits and management reviews shall be conducted to maintain robust Anti-Money Laundering controls.

14. APPROVAL.

This Anti-Money Laundering Policy has been reviewed and approved by the Firm's senior management and is effective as of the date below.

Contact (s) for General and Managerial enquiries:

Name: **EVA KENTARO MUGERWA.**

Signature: 

Address: **PLOT 1A1-7A1, ROBERT MUGABE ROAD MBUYA, OPPOSITE RIVONIA SUITES.**

Telephone/ Fax numbers: **0772517341**

E-mail address: **eva@kmlawadvocates.com / evakmugerwa@gmail.com**