

Anti-Money Laundering (AML) Policy

This Anti-Money Laundering (AML) Policy outlines the commitment of Shenandoah Capital Ltd, reg 16626886, in England and Wales to preventing the use of the business for money laundering, terrorist financing, or any other illicit activities. As a U.K. registered business operating within the derivatives trading industry, we adhere strictly to all relevant laws and regulations.

The company limits its assets under management to no more than the value of £50 million.

1. Purpose

The purpose of this policy is to ensure that Shenandoah Capital Ltd. has robust systems and controls in place to detect, prevent, and report any suspicious activities related to money laundering or the financing of terrorism. We are committed to maintaining the highest reasonably practicable standards of compliance and integrity in all our operations.

2. Customer Due Diligence (CDD)

- All clients must undergo thorough identity verification prior to accessing our business. This includes, but is not limited to, the collection and verification of official identification documents and proof of address.
- Enhanced due diligence is conducted for higher-risk individuals, particularly where complex or large transactions are involved.
- The company only allows applicants for shareholding from reputable and regulated countries that do not appear on financial watch lists.
- The company confirms and implements mandatory OFAC, EU and UN sanction screening
- The company also undergoes adverse media screening as part of the KYPS(Know Your Prospective Shareholder) process.

3. Ongoing Monitoring

- Transactions undertaken by prospective and full shareholders are subject to ongoing monitoring to identify suspicious or unusual activity.
- Patterns of behaviour inconsistent with a shareholder's profile or expected activity will be investigated by our compliance team.

4. Reporting Suspicious Activity

- All staff are trained to recognise and report suspicious activities to the designated Money Laundering Reporting Consultant (MLRC).
- Suspicious activity reports (SARs) are filed with the appropriate authorities in accordance with applicable legal requirements.

5. Record Keeping

- Shenandoah Capital Ltd. maintains comprehensive records of shareholders identification, transaction history, and due diligence for a minimum period as required by law.

6. Staff Training

- All relevant employees receive regular training on AML regulations, internal policies, and procedures to ensure ongoing awareness and compliance.

7. Policy Review

This policy is reviewed and updated on a regular basis, or as required by changes in legislation or business operations, to ensure its effectiveness and compliance with current regulatory requirements.

For further information, please contact our team on info@shenandoahfx.com



Francis Roelofse
Director

21st November 2025