

AML/ATF AND SANCTIONS REGIME

MJM Limited is regulated under the Bermuda Bar Act 1974 and the Proceeds of Crime (Anti-Money Laundering and Terrorist Financing Supervision and Enforcement) Act 2008. As a regulated professional services firm, MJM Limited is required to comply with the Regulations on gathering appropriate client due diligence information for clients and prospective clients before accepting instructions to act, monitoring client activities periodically, and maintaining records for the purposes of complying with Bermuda's international anti-money laundering, anti-terrorist financing and sanctions enforcement obligations. MJM Limited has adopted policies and procedures to ensure that clients of the firm are not in breach of any relevant laws in Bermuda or elsewhere, and to decline to act for clients when the compliance measures cannot be fulfilled to a satisfactory degree. MJM Limited's compliance measures may include making a report to the Financial Intelligence Agency where client activities give rise to a reason of suspicion that a client is or has been engaged in criminal activity or report where there is potential breach of sanctions measures to the Financial Sanctions Implementation Unit. MJM Limited maintains strict controls over client due diligence information and the protection of private or personal information relating to clients. These obligations may be overwritten by regulatory enforcement action which may require MJM Limited to disclose information relating to a client. MJM Limited is required to maintain client professional privilege at all times. For further information of MJM Limited's regulatory obligations please contact the Compliance Officer at compliance@mjm.bm.

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