

## **AML/ATF AND SANCTIONS REGIME**

Quorum Limited and Quorum Services Limited are regulated under the Corporate Service Provider Business Act 2012, with Quorum Limited also regulated under the Trusts (Regulation of Trust Business) Act 2001 and in accordance with the Proceeds of Crime (Anti-Money Laundering and Terrorist Financing Supervision and Enforcement) Act 2008. As regulated financial institutions, Quorum Limited and Quorum Services Limited are 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. Quorum Limited and Quorum Services Limited have 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. Quorum Limited and Quorum Services 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. Quorum Limited and Quorum Services Limited maintain 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 Quorum Limited and Quorum Services Limited to disclose information relating to a client. For further information of Quorum Limited and Quorum Services Limited's regulatory obligations please contact the Compliance Officer at [compliance@mjm.bm](mailto:compliance@mjm.bm).

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