Financial Crime Framework (v1.2)

Mittenda Limited · internal document · published as a specimen excerpt

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Version	Date	Change
1.2	February 2026	Annual review, with the AML/CTF Policy cycle
1.1	April 2025	Crypto-asset services brought into scope on authorisation
1.0	June 2024	Initial issue, with the restructure of the policy estate over the Standards framework

Contents

Sections in bold are excerpted below.

1. Purpose

1.1 This Framework establishes how Mittenda organises the prevention of financial crime: the disciplines in scope, the accountability for each, the documents through which each is governed, and the assessment and appetite that direct them.

1.2 It is approved by the Board and reviewed at least annually. The policies and Standards made under it carry its requirements into each discipline; nothing in this Framework relieves any obligation under them.

2. The financial crime portfolio

2.1 The disciplines of the portfolio are: money laundering and terrorist financing; financial sanctions and restrictive measures; fraud; bribery and corruption; and the facilitation of tax evasion.

2.2 Each discipline is governed by the document named in §4.1 and owned by the role named there. Where a matter falls within more than one discipline, the Head of Financial Crime (MLRO) determines the lead discipline.

3. Governance and accountability

3.1 The Board owns this Framework and approves it annually, together with the Risk Appetite Statement.

3.2 The Head of Financial Crime (MLRO) is accountable for the portfolio and reports quarterly to the Board on the state of each discipline against the appetite set in the Risk Appetite Statement.

3.3 The Risk and Compliance Committee approves the Standards made under the AML/CTF Policy and oversees their operation and the measures reported under them.

4. The document framework

4.1 The governing document and owner for each discipline:

Discipline	Governing document	Owner
Money laundering and terrorist financing	AML/CTF Policy	Head of Financial Crime (MLRO)
Financial sanctions and restrictive measures	AML/CTF Policy §11; Sanctions Screening Standard	Head of Financial Crime (MLRO)
Fraud	Fraud Policy	Head of Financial Crime (MLRO)
Bribery and corruption	Anti-Bribery and Corruption Policy	Head of Compliance
Facilitation of tax evasion	AML/CTF Policy, as a predicate offence to money laundering	Head of Financial Crime (MLRO)

4.2 Each governing document is approved as §3 provides, is reviewed at least annually, and carries a document-control record in the MTD scheme. The Standards and Procedures beneath them are recorded in the document register at Appendix A.

5. Risk assessment

5.1 A business-wide financial crime risk assessment is performed at least annually, and on any material change to the business, covering each discipline of the portfolio across Mittenda's customers, products and services, delivery channels, geographies and transaction types.

5.2 The assessment is produced by the Head of Financial Crime (MLRO) and approved by the Board. Its conclusions calibrate the Standards and the risk-based procedures beneath them. For money laundering and terrorist financing it constitutes the assessment required by the AML/CTF Policy §3.

6. Risk appetite

6.1 The Board's appetite for financial crime risk is set in the Risk Appetite Statement, approved annually alongside this Framework.

6.2 The portfolio is managed within that appetite. A position outside appetite is escalated to the Board through the reporting in §3.2, with a remediation path and a timeframe.

[Section 7 and Appendix A omitted]