

Luura Proportionate AML and Financial Crime Policy

Last updated: 10 October 2025

Applies to: Luura Ltd and all associated contractors or partners

1. Purpose

This policy sets out how Luura prevents and reduces the risk of money laundering and terrorist financing. Although Luura is not a regulated financial institution, we operate within the UK financial ecosystem and are committed to high standards of compliance and transparency.

2. Scope

This policy applies to Luura's operations, platform, and partnerships, including user onboarding, regulated third-party providers for Open Banking and payment processing, and any data or product activities that could indirectly relate to financial transactions.

3. Risk Status

Luura does not hold, transmit, or directly process customer funds; does not have access to sensitive financial data; and relies on regulated third-party providers to handle all payments, transfers, and bank data. Because of this, Luura's exposure to money laundering and terrorist financing risk is very low.

4. Responsibilities

Compliance Lead: Kiesha Okeowo (Founder) – responsible for ensuring this policy remains accurate and that any concerns about suspicious activity are logged and reviewed. Regulated third-party providers are responsible for customer due diligence (CDD) and reporting suspicious activity under their own AML obligations.

5. Customer Due Diligence (CDD)

Luura's regulated third-party providers carry out all identity verification, transaction monitoring, and payment processing. Luura ensures that only verified users can access financial features, all providers used are authorised and regulated under UK law, and that we cooperate fully with partners and authorities if a legitimate request for information arises.

6. Suspicious Activity

While Luura does not directly monitor user transactions, any unusual or potentially fraudulent activity noticed will be logged by the Compliance Lead and escalated to the relevant regulated provider or, if necessary, to the National Crime Agency (NCA).

7. Record Keeping

Luura keeps logs of user onboarding activity, documentation of third-party AML arrangements and contracts, and copies of this and related compliance policies. All records are stored securely for at least five years in line with UK data protection and privacy laws.

8. Staff Awareness and Training

As a single-person company, the founder maintains awareness of AML obligations through FCA and HMRC guidance. If Luura expands, AML and financial crime training will be mandatory for all new team members.

9. Review

This policy will be reviewed annually or sooner if Luura's operations change, such as beginning to handle or view financial data directly, or if regulatory requirements evolve.

Approved by: Kiesha Okeowo, Founder & Compliance Lead
Date: 10 October 2025