

**As of January 2023**

**RE: Letshego Holdings Limited Global Anti-Money Laundering Compliance Program**

Letshego Holdings Limited (“LHL, Letshego or the Group”) and each of its subsidiaries are firmly committed to participating in international efforts to combat money laundering and the funding of terrorist activities. LHL is a publicly listed entity under the Botswana Stock Exchange and a registered holding company headquartered in Gaborone, Botswana regulated by the Non-Bank Financial Institutions Regulatory Authority.

Letshego has implemented a risk-based global Anti-Money Laundering (“AML”) Compliance Program (“AML Program”) designed to comply with AML laws and regulations in Botswana (“Botswana Financial Intelligence Act 2022, Financial Intelligence Regulations 2022”), Financial Action Task Force (“FATF”) and Eastern and Southern Africa Anti-Money Laundering Group (“ESAAMLG”) recommendations and all other applicable laws and regulations relating to the prevention of money laundering and terrorist financing in the jurisdictions where Letshego operates. The AML Program consists of:

- Designations of a Group Head of AML and subsidiary AML Compliance Officers who are responsible for coordinating and monitoring day to day compliance with the AML Program for the business and their regions respectively;
- AML risk assessments at the business, channel, customer, environmental, products & services and geographic levels;
- Regulatory oversight through written policies, procedures and a system of internal controls designed to facilitate ongoing compliance;
- Due diligence standards (“Simplified or Enhanced”) which are reasonably designed to identify and verify all customers, staff, suppliers and stakeholders to the extent required by regulations;
- Risk based measures and systems (“Compliance automation”) for ongoing monitoring of transactions and activities through customers’ accounts;
- Identification and reporting of suspicious transactions or activities to appropriate regulatory authorities in accordance with applicable laws;
- Record keeping and reporting requirements which are maintained for at least twenty (20) years after termination of the relationship;
- Prohibition from conducting business with shell banks, anonymous accounts and processing bearer shares;
- AML risk awareness through AML training for appropriate personnel;
- Independent audit and compliance testing to review and assess compliance with the AML Program and applicable laws;

The Group is also subject to the Sanction notices issued by the United Nations Security Council (“UNSC”), Office of Foreign Assets Control (“OFAC”), Her Majesty Treasury’s Office (“HMT”), European Union (“EU”), African Union (“AU”), Southern African Development Committee (“SADC”) and local sanctions watchlists. Letshego has implemented policies and procedures designed to ensure compliance with the prohibitions and restrictions mandated and all other sanctions laws and regulations applicable in the jurisdictions the subsidiaries operate.



Compliance with our AML Program and internal procedures allows us to maintain good standing in the jurisdictions in which we transact business. Letshego cooperates to the fullest extent permitted by law with investigations and inquiries from law enforcement and regulatory authorities.

Letshego prides itself in continuously working to adopt principles and industry standards and international best practices to combat money laundering and terrorist financing. For information regarding Letshego's business and the products and services offered please visit [www.letshego.com](http://www.letshego.com).