



HAVILAH & ASHER GROUP

AML, KYC AND SANCTIONS COMPLIANCE POLICY

Effective Date: 24 April 2026

Havilah and Asher Group Roads Civils Oil Gas Petroleum Electrical Construction International (Pty) Ltd

Effective Date: 24 April 2026

Legal Base: Republic of South Africa

10. AML, KYC AND SANCTIONS COMPLIANCE POLICY

HAVILAH AND ASHER GROUP ROADS | CIVIL | OIL & GAS | PETROLEUM | ELECTRICAL | CONSTRUCTION | INTERNATIONAL (PTY) LTD

Effective Date: 24 April 2026

10.1 Purpose

This AML, KYC and Sanctions Compliance Policy supports the Company's commitment to preventing money laundering, terrorist financing, sanctions breaches, fraud, corruption, illicit trade, and other unlawful activity.

10.2 Verification

The Company may request identity documents, company registration documents, proof of address, beneficial ownership information, source-of-funds information, source-of-wealth information, bank confirmations, tax details, mandates, authorisations, transaction documents, and other information needed for due diligence.

HAVILAH & ASHER GROUP - ROADS CIVILS OIL GAS PETROLEUM
ELECTRICAL CONSTRUCTION INTERNATIONAL PTY LTD



Mario Naidoo – CEO



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havilahandasher-group.com

Reg nr 2021/582571/07



HAVILAH & ASHER

GROUP

10.3 Risk-Based Approach

The Company may apply enhanced review where a transaction involves high-value goods, commodities, international trade, new counterparties, foreign payments, third-party payments, politically exposed persons, unusual structures, high-risk jurisdictions, or incomplete documentation.

10.4 Refusal and Reporting

The Company may refuse, suspend, terminate, or report any transaction where suspicious activity, sanctions exposure, false documentation, unexplained funds, unusual payment behaviour, fraud risk, or unlawful conduct is suspected.

10.5 No Circumvention

Clients must not attempt to bypass due diligence, split transactions to avoid controls, use undisclosed third parties, obscure beneficial ownership, misstate transaction purpose, or provide false information.

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