



BOARD OF DIRECTORS MEETING MINUTES

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SureWin B.V

Date: 26 June 2026

Time: 10:00am

Location: Virtual Meeting

Chairperson: Craig Murugan

Attendees:

- Director - Analissa Heiland
- Director - Lorenza Godett
- MLRO – Everhona Fransisca Makaya
- AML Compliance Officer – Craig Murugan
- Legal / Compliance – Nadia Du Toit

CHAIRPERSON

Craig Murugan was appointed as Chairperson of the meeting and declared the meeting open. Nadia Du Toit recorded the Minutes.

QUORUM

The Chairperson confirmed that a quorum was present and declared the meeting duly constituted.

AGENDA ITEM 1 – APPROVAL OF AML/CFT COMPLIANCE FRAMEWORK

The Board reviewed the Company's Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Compliance Policy, including the following:

- AML/CFT Policy;
- Customer Due Diligence and Enhanced Due Diligence Procedures;
- Source of Funds and Source of Wealth Verification Procedure;
- Sanctions Screening procedure;
- Politically Exposed Persons (PEP) Procedure;
- Transaction Monitoring and Linked Transaction Detection Procedure;
- Suspicious Activity Reporting Procedure;
- AML Audit Framework;
- AML Compliance Monitoring;
- AML Training

The Board noted that the AML/CFT framework has been developed in accordance with applicable Curaçao legislation, regulatory requirements, and international AML/CFT standards.

RESOLUTION 1

IT WAS RESOLVED THAT:

- The AML/CFT Compliance Policy and procedures listed above are hereby approved.
- The Board authorises management to implement and maintain the AML/CFT framework throughout the organisation.

RESOLUTION PASSED UNANIMOUSLY.

AGENDA ITEM 2 – APPOINTMENT OF AML COMPLIANCE OFFICER

The Board reviewed the proposed appointment of Craig Murugan as AML Compliance Officer and Everhona Fransisca Makaya as the Money Laundering Reporting Officer (MLRO).

RESOLUTION 2

IT WAS RESOLVED THAT:

Craig Murugan is formally appointed as AML Compliance Officer and Everhona Fransisca Makaya as MLRO and shall have responsibility for:

- Oversight of AML/CFT compliance;
- Suspicious transaction reporting;
- Regulatory reporting;
- AML training oversight;
- Ongoing monitoring of AML risks;
- Reporting AML matters to Senior Management and the Board.

RESOLUTION PASSED UNANIMOUSLY.

AGENDA ITEM 3 – AML GOVERNANCE AND REPORTING

The Board considered the proposed AML governance structure and reporting framework.

RESOLUTION 3

IT WAS RESOLVED THAT:

The Compliance Officer (Craig Murugan) shall provide AML reports to the Board on a quarterly basis including:

- High-risk customer statistics;
- PEP reviews;
- Sanctions screening results;
- Source of Funds and Source of Wealth investigations;
- Transaction monitoring outcomes;
- Suspicious activity reporting statistics;
- AML training completion rates;
- Compliance monitoring results;

- Outstanding remediation actions.

RESOLUTION PASSED UNANIMOUSLY.

AGENDA ITEM 4 – AML AUDIT AND INDEPENDENT REVIEW

The Board reviewed the AML Audit Framework.

RESOLUTION 4

IT WAS RESOLVED THAT:

An independent AML/CFT review shall be conducted at least annually.

All findings shall be reported to the Board together with remediation plans and implementation timelines.

RESOLUTION PASSED UNANIMOUSLY.

AGENDA ITEM 5 – ANNUAL REVIEW REQUIREMENT

The Board agreed that all AML/CFT policies, procedures and risk assessments shall be reviewed at least annually or sooner where required by changes in legislation, regulation, business activities, products, services or risk exposure.

RESOLUTION PASSED UNANIMOUSLY.

There being no further business, the meeting was adjourned.

Signed:  _____
Chairperson

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