Ghana Infrastructure Investment Fund

Standard Operating Procedure (SOP)

AML/CFT, KYC and Third-Party Due Diligence

As approved by the Management on 20th August 2026

Table of Contents

GHANA INFRASTRUCTURE INVESTMENT FUND

STANDARD OPERATING PROCEDURE (SOP)
AML/CFT, KYC and Third-Party Due Diligence

1. Introduction

This SOP operationalises the GIIF Anti-Money Laundering and Counter-Terrorism Financing Policy. It provides a consistent and proportionate process for identifying counterparties, verifying ownership and control, screening for sanctions and Politically Exposed Persons, assessing risk, conducting Enhanced Due Diligence where necessary.

2. Purpose and Scope

The purpose of this SOP is to ensure that GIIF understands with whom it is dealing, applies controls and maintains evidence of the checks, decisions and monitoring undertaken.

It applies to relevant GIIF staff and functions involved in sourcing or receiving funds, investment appraisal, project financing, procurement, contracting, payment, monitoring, compliance and assurance. It covers:

- funding sources, co-financiers and institutional investors;
- project sponsors, investees, borrowers, special-purpose vehicles and material beneficial owners;
- contractors, consultants, suppliers, service providers and other procurement counterparties;
- agents, intermediaries, consortium members and other persons acting for or receiving funds from GIIF; and
- directors, authorised signatories, controllers and key associated persons where their screening is relevant to the risk.

3. Definitions and Abbreviations

Term	Meaning
Adverse Media	Credible public information indicating possible financial crime, corruption, terrorism, serious misconduct or other material integrity concerns.
AML/CFT	Anti-money laundering and countering the financing of terrorism.
Head of Risk and Sustainability/AMLRO	The officer designated by GIIF to receive internal suspicious activity reports and discharge applicable reporting responsibilities.
Beneficial Owner	The natural person who ultimately owns or controls a legal person or arrangement, or on whose behalf a transaction is conducted.
CDD/KYC	Measures used to identify and verify a counterparty, understand ownership and control, establish the purpose of the relationship and assess its risk.
Counterparty	Any person or entity within the scope of this SOP with which GIIF proposes to enter or maintain a funding, investment, procurement, contractual or payment relationship.

Term	Meaning
EDD	Additional due-diligence measures applied where the risk is high or a specified trigger exists.
PEP	A politically exposed person, including applicable family members and close associates under law and GIIF policy.
Red Flag	Information or behaviour that may indicate heightened ML/TF, sanctions, fraud, corruption or integrity risk.
Sanctions	Binding or relevant restrictions imposed by the United Nations, Ghanaian authorities or other lists adopted by GIIF under its policy and contractual obligations.
STR/SAR	A suspicious transaction or suspicious activity report made through the AMLRO to the competent authority where required.

4. Guiding Principles and Proportionate Risk-Based Approach

- No relationship shall be approved solely on reputation, familiarity or commercial urgency
- Due diligence shall be proportionate to the counterparty, relationship, value, geography, ownership, payment structure and identified red flags
- Credible institutional status may justify simplified measures, but not the absence of identity, authority, sanctions and purpose checks
- A confirmed prohibited-party match, inability to identify a required beneficial owner or unresolved material suspicion shall not be overridden by a numerical score
- The officer preparing the assessment and the officer approving a high-risk or PEP relationship shall be different persons
- Information shall be handled confidentially and only by persons who need it for their duties
- No person shall alert a counterparty that a suspicious activity report has been or may be made

5. Responsibilities Matrix

The following matrix establishes responsibility for due diligence and the minimum separation between preparation, review and approval. No officer shall both prepare and approve the same due-diligence assessment.

Activity	Responsible officer or function	Review or approval
Collect counterparty information and documents	Investment, Procurement or requesting function	Relevant business head
Conduct AML/CFT screening and prepare the risk assessment	Risk and Compliance Officer/ Senior E&S Coordinator	Head of Risk and Sustainability/AMLRO
Clear low- and medium-risk assessments	Head of Risk and Sustainability/AMLRO	N/a
Conduct and review Enhanced Due Diligence	Risk and Compliance Officer prepares; Head of Risk and Sustainability/AMLRO reviews	CEO

Resolve screening matches and assess suspicious activity	Head of Risk and Sustainability/AMLRO	CEO
Complete pre-disbursement verification	Investment function, Finance and Risk and Sustainability	Applicable disbursement authority
Maintain records, monitor counterparties and report	Risk and Compliance Officer	Head of Risk and Sustainability/AMLRO
Provide independent assurance	Internal Audit	Audit Committee

6. Counterparty Categories and Applicable Due-Diligence Levels

The responsible function shall determine an initial due-diligence level before information is collected. The level may be increased at any time. Simplified treatment is permitted only where the reasons are documented and no red flag is present.

Level	Typical application	Minimum treatment
Level 1 - Simplified	Government bodies; multilateral or bilateral development institutions; regulated financial institutions; credible institutional investors; and low-risk procurement counterparties where GIIF's approved thresholds permit.	Verify legal identity and authority; confirm purpose; screen the entity and relevant persons; confirm payment details; document the basis for simplified treatment.
Level 2 - Standard	Project sponsors, investees, borrowers, SPVs, material suppliers, contractors and consultants; non-institutional funding sources; or any relationship not clearly eligible for Level 1.	Complete identity, legal status, ownership/control, beneficial ownership, purpose, sanctions/PEP/adverse-media screening, risk scoring, recommendation and approval.
Level 3 - Enhanced	High-risk relationships, PEPs, complex or opaque ownership, higher-risk jurisdictions or sectors, unusual funding/payment structures, material adverse information or other EDD triggers.	Complete standard due diligence plus additional verification, source-of-funds/wealth checks where relevant, senior approval, conditions and enhanced monitoring.

7. Due Diligence

All due diligence shall be documented using Annex 1. Evidence may be drawn from reliable independent sources, official records, regulated databases, counterparty documents and appropriately documented professional judgement.

7.1 Overall Due-Diligence Process Flow

Figure 1. Overall process

Classify counterparty → Collect and verify → Screen and risk-rate → EDD if triggered → Approve and register → Monitor and refresh

Step 1 – Classify:

Identify the counterparty category, relationship, business owner and proposed due-diligence level.

Step 2 - Collect and verify:

Obtain the information appropriate to the level and verify it against reliable sources.

Step 3 - Screen and risk-rate:

Screen relevant parties, assess red flags and complete the risk-rating methodology in section 7.8.

Step 4 - Enhance where necessary:

Complete EDD under section 7.9 if a trigger is present or the initial result is high risk.

Step 5 - Decide and record:

Record the recommendation, escalation and approval. Enter the case in the Due-Diligence Register.

Step 6 – Monitor:

Apply the refresh frequency and event-driven checks in section 8.

7.2 Due Diligence on Funding Sources and Institutional Investors

Figure 2. Funding-source process

Confirm institution → Verify authority and purpose → Screen → Assess residual risk → Approve / EDD

GIIF may use Level 1 measures for a government source, multilateral or bilateral development institution, regulated financial institution or other credible institutional investor where its identity, mandate, supervision and ownership are transparent. The assessment shall record:

- legal name, jurisdiction, legal or regulatory status and official website;
- mandate and purpose of the funding relationship;
- authorised representatives and payment account;
- applicable sanctions and adverse-media screening;
- any unusual conditions, intermediaries, third-party payments or source-of-funds concerns; and
- the basis for the selected due-diligence level.

Institutional status shall not justify simplified treatment where the arrangement is opaque, routed through an unexplained intermediary, involves an unusual payment structure or otherwise presents a red flag.

7.3 Due Diligence on Project Sponsors, Investees and Borrowers

Figure 3. Project-counterparty process

Identify entity and project → **Verify ownership and control** → **Screen key persons** → **Risk-rate / EDD** → **Investment approval** → **Pre-disbursement check**

Standard due diligence shall ordinarily be completed before GIIF commits to an investment or financing relationship. It shall cover the legal entity, purpose and expected value of the relationship, ownership and control, beneficial owners, directors and authorised signatories, licences where material, sanctions/PEP/adverse-media screening, risk rating and approval.

Before disbursement, the responsible function shall confirm that the due diligence remains valid, no material ownership or legal-status change has occurred, screening is current, the beneficiary bank account is verified and outstanding conditions have been satisfied.

7.4 Due Diligence in Procurement and Contracting

Figure 4. Procurement process

Set DD level → **Preferred bidder identified** → **Verify and screen** → **Clear / escalate** → **Award and contract** → **Monitor**

Procurement due diligence shall be proportionate to contract value, duration, service, access to GIIF funds or information, use of agents or subcontractors, geography and integrity risk. The procurement plan or solicitation may identify the expected level, but the final level shall be confirmed when the preferred bidder is known.

- Level 1 may be used for low-risk, lower-value routine purchases under thresholds approved by GIIF, provided identity, authority, sanctions and payment-account checks are completed.
- Level 2 shall apply to material contractors, consultants, suppliers, advisers and service providers, particularly where they handle funds, act for GIIF, interact with public officials or operate at project sites.
- Level 3 shall apply where an EDD trigger exists, including use of undisclosed agents, complex ownership, high-risk geography, adverse information or unusual payment requests.
- The contract shall include applicable AML/CFT, sanctions, information-update, audit/cooperation, suspension and termination provisions.
- A counterparty shall not be split across purchase orders or contracts to avoid the applicable due-diligence level.

7.5 Standard KYC and Counterparty Due Diligence

For Level 2 due diligence, the responsible officer shall complete the following minimum steps:

- record the counterparty's legal name, type, registration number, jurisdiction, address and contact details;

- understand and document the purpose, expected value, duration and nature of the relationship;
- verify legal existence using reliable documents or official records;
- identify directors, controllers, authorised representatives and relevant signatories;
- identify and take reasonable steps to verify required beneficial owners;
- screen the entity and relevant persons under section 7.7;
- complete the risk assessment under section 7.8;
- resolve discrepancies and obtain missing information; and
- record a recommendation and approval before commitment, award, contract execution or disbursement, as applicable.

7.6 Legal Status, Ownership and Beneficial Ownership Verification

Verification shall be sufficient for GIIF to understand who owns, controls and can bind the counterparty. The record should include incorporation or establishment documents, current registry information where available, licences relevant to the activity, constitutional documents where necessary, and evidence of authorised signatories.

For legal persons, the responsible officer shall trace ownership through intermediate entities to the relevant natural persons and document the ownership and control structure. Where a government or publicly listed entity is subject to transparent ownership arrangements, the reason for not identifying natural-person beneficial owners shall be recorded. Nominees, trusts, bearer instruments, unexplained layers or inconsistent information require escalation.

7.7 Sanctions, PEP and Adverse-Media Screening

Screening shall be conducted before approval and repeated at the points specified in sections 7.10 and 8. The screening sources and mediums shall include, as applicable:

- United Nations Security Council Consolidated Sanctions List;
- relevant Ghanaian sanctions, regulatory and debarment lists;
- US Office of Foreign Assets Control sanctions lists;
- UK Sanctions List;
- EU Consolidated Financial Sanctions List;
- French National Asset-Freezing Register;
- World Bank Listing of Ineligible Firms and Individuals;
- African Development Bank debarment list;
- reliable PEP databases;
- company and beneficial-ownership registries;
- regulatory and law-enforcement notices;
- credible adverse-media searches; and
- an approved commercial screening platform, where available.

Screening shall cover the counterparty and, according to the level of risk, its beneficial owners, controllers, directors, authorised representatives and other key associated persons. All possible matches shall be reviewed using available identifying information and checked against the relevant official source before a decision is made.

Result	Required action
No match	Record the date, source and result; proceed to risk assessment.
Possible match	Do not reject or approve automatically. Compare identifiers, obtain further information and refer to the AMLRO for resolution.
Confirmed prohibited match	Stop the process, restrict the relationship or transaction, preserve confidentiality and refer immediately to the AMLRO.
PEP identified	Apply EDD and obtain the approval required by the Policy. PEP status alone is not proof of misconduct.
Material adverse media	Assess credibility, recency, seriousness and relevance; apply EDD or restrict the relationship where concerns remain unresolved.

The screening record shall show the subject screened, sources or tool used, date, search parameters, result, match-resolution analysis and reviewer.

7.8 AML/CFT Risk Assessment and Risk Rating

The responsible officer shall score each applicable factor using the table below. A score must be supported by a short reason and evidence. A factor that is genuinely not applicable may be scored zero with an explanation.

Factor	Low score	Low indicators	Med. score	Medium indicators	High score	High indicators
Country/geography	0	Ghana or transparent low-risk jurisdiction; no cross-border complexity	1-2	Some cross-border exposure or moderate concern	3	Higher-risk, sanctioned or poorly controlled jurisdiction exposure
Entity and ownership	0	Public body, regulated institution or simple transparent ownership	1-2	Private entity with verifiable ownership	3	Complex, opaque, nominee or unexplained ownership/control
Sector/activity	0	Low inherent exposure	1-2	Moderate exposure	3	Cash-intensive, high-value, extractive, arms, virtual asset or other heightened-risk activity
PEP, sanctions and adverse information	0	No relevant concerns	1-3	PEP or credible concern capable of resolution	4	Serious or unresolved concern; confirmed prohibited match is an override

Factor	Low score	Low indicators	Med. score	Medium indicators	High score	High indicators
Value and transaction structure	0	Routine, transparent and proportionate	1-2	Large or moderately complex	3	Unusual, unnecessarily complex or inconsistent with stated purpose
Delivery and payment channels	0	Direct account in counterparty name	1	Non-face-to-face or cross-border	2	Cash, third-party account, unexplained intermediary or unusual routing
Relationship and reputation	0	Established credible institution or satisfactory record	1	New relationship or limited history	2	Material disputes, allegations, evasiveness or inconsistent information

Total score	Overall rating	Minimum response
0-5	Low	Complete the applicable Level 1 or Level 2 checks. Obtain clearance from the Head of Risk and Sustainability/AMLRO and apply routine monitoring.
6-10	Medium	Complete Level 2 due diligence. The Head of Risk and Sustainability/AMLRO shall review and approve the assessment and may require additional checks, conditions or enhanced monitoring.
11-20	High	Complete Level 3 enhanced due diligence. The Head of Risk and Sustainability/AMLRO shall review and recommend the decision. CEO approval and enhanced monitoring are required if the relationship proceeds.

7.9 Enhanced Due Diligence

EDD shall be conducted where the total rating is high or any EDD trigger is present. The Head of Risk and Sustainability/AMLRO may require EDD for a medium-risk case where the available information does not provide sufficient assurance.

- PEP status or close association with a PEP;
- higher-risk jurisdiction, sector or transaction exposure;
- complex, opaque or unexplained ownership or control;
- material or unresolved adverse media;
- unusual source of funds, payment route, intermediary, agent or third-party account;
- large, complex or unusually structured transaction inconsistent with the stated purpose;
- reluctance, delay or inconsistency in providing information;
- prior regulatory, criminal, corruption, fraud or sanctions concerns; or
- any other red flag identified by staff or the AMLRO.

Figure 5. Enhanced due-diligence workflow

Identify trigger → **Pause approval** → **Define extra checks** → **Verify and analyse** → **AMLRO review** → **Approve, condition or reject**

EDD measures shall be selected according to the trigger and may include:

- additional independent verification of identity, legal status, ownership and control;
- a documented ownership chart and explanation of intermediate entities;
- source-of-funds and, where relevant, source-of-wealth information supported by credible evidence;
- additional regulatory, litigation, enforcement, procurement-debarment and adverse-media checks;
- verification of the commercial rationale, contract structure, pricing, intermediaries and payment route;
- direct confirmation from a regulator, funder, bank, professional adviser or other reliable source where lawful;
- a meeting with senior representatives or a site visit;
- written representations, contractual conditions, enhanced audit rights or transaction controls; and
- more frequent screening, review or payment monitoring.

EDD shall be documented in Annex 2. The outcome shall be approve, approve subject to stated conditions, defer pending information, reject, or refer for suspicious activity consideration. The approver shall not be the preparer.

7.10 Pre-Approval and Pre-Disbursement Verification

Immediately before the relevant commitment, award, contract execution or disbursement, the responsible function shall confirm that:

- the due-diligence assessment remains within its validity period;
- no material change has occurred in legal status, ownership, control, authorised signatories or purpose;
- sanctions and other required screening has been repeated or remains current under the approved frequency;
- the payment account is held in the approved counterparty's name, unless an exception has been independently verified and approved;
- EDD conditions and other approval conditions have been satisfied; and
- no new red flag or suspicious activity has arisen.

The date, result and officer performing the check shall be recorded. A material change or new concern shall pause the transaction and be escalated under section 7.11.

7.11 Recommendation, Escalation and Approval

A possible or confirmed sanctions match, credible suspicion of money laundering or terrorist financing, inability to verify required beneficial ownership, false or misleading information, or another material red flag shall be referred immediately to the Head of Risk and Sustainability/AMLRO. The AMLRO may require additional due diligence, impose an interim restriction, recommend rejection or conditional approval, or determine whether external reporting or referral is required.

Where the normal preparer or reviewer has an actual, potential or perceived conflict of interest, the matter shall be reassigned through a conflict-free route. Where the Head of Risk and Sustainability/AMLRO is conflicted, the matter shall be handled by a formally designated alternate.

Every escalation shall record the issue, information considered, decision, decision-maker, date, conditions and monitoring requirements. Commercial urgency shall not justify bypassing the required due-diligence or approval process.

8. Ongoing Monitoring and Due-Diligence Refresh

Monitoring shall be proportionate to risk and coordinated with existing investment, contract, project and financial monitoring. The business owner shall notify Risk and Sustainability of material changes.

Risk	Minimum refresh	Minimum scope
Low	At least every three years, or earlier on a trigger event	Identity/status, ownership changes, sanctions screening, purpose and payment details.
Medium	At least every two years, or earlier on a trigger event	Standard refresh plus updated risk assessment and targeted review of identified risks.
High / PEP	At least annually, or more frequently as approved	EDD refresh, source-of-funds/wealth where relevant, screening, conditions and enhanced monitoring.

Trigger events include a change in ownership, control, directors, legal status, licence, jurisdiction, scope, contract value, payment account or project purpose; a new PEP or sanctions result; credible adverse media; unusual payment instructions; suspected fraud or corruption; material breach; or information inconsistent with the existing profile.

The AMLRO may shorten a review period. A relationship shall not remain recorded as current where the required refresh is overdue and material transactions are continuing without an approved interim control.

9. Suspicious Activity Reporting and External Referral

Figure 6. Suspicious activity route

Staff identifies concern → **Report confidentially to AMLRO** → **AMLRO assesses** → **Restrict if necessary** → **Report / refer where required** → **Record and monitor**

A member of staff who knows, suspects or has reasonable grounds to suspect ML/TF or related prohibited conduct shall report the concern promptly and confidentially to the AMLRO through an approved internal channel. The report should state the facts and preserve available records. The employee shall not investigate beyond their authority, confront the counterparty or disclose that a report has been or may be made.

The AMLRO shall assess the concern, seek information on a need-to-know basis, determine any immediate restriction and make or coordinate reporting to the Financial Intelligence Centre or another competent authority where required by applicable law. Statutory reporting periods shall take precedence over internal timelines. External reporting and any decision not to report shall be documented securely.

A suspicious activity report does not automatically determine contractual or disciplinary liability. GIIF may take lawful protective, contractual or risk-management action provided it does not prejudice an external process or result in tipping off.

10. Restriction, Rejection, Suspension and Termination

GIIF may refuse onboarding, defer approval, withhold or suspend a transaction, impose conditions, reject a bid where permitted, suspend performance or terminate a relationship where:

- required identity, ownership, authority or purpose information is not provided or cannot be verified;
- a confirmed sanctions or other prohibited-party restriction applies;
- material information is false, forged, misleading or deliberately withheld;
- EDD does not reduce the risk to a level acceptable to GIIF;
- a suspicious payment route or other red flag remains unresolved;
- the counterparty breaches applicable AML/CFT or information-update obligations; or
- continuation would be unlawful or expose GIIF to unacceptable financial, integrity or reputational risk.

The decision shall be made under the applicable investment, procurement, contractual and governance authority, with Legal and AMLRO advice where necessary. The reason and action taken shall be recorded without disclosing protected suspicious-reporting information.

11. Record Keeping, Confidentiality and Information Management

Risk and Sustainability shall maintain the Due-Diligence Register and ensure that the assessment, supporting documents, screening evidence, risk score, EDD, approval, conditions, refreshes and closure are retained in a secure and retrievable form.

- Records shall be retained for at least the period required by applicable law and GIIF's records-retention framework, measured from the end of the relationship or relevant transaction.
- Access shall be role-based and limited to persons with a business, oversight, audit or legal need.
- STR/SAR information and related analysis shall be segregated and subject to heightened access controls.
- Copies of identity and ownership information shall be protected against unauthorised use, alteration or disclosure.
- The register used for management reporting shall not contain unnecessary sensitive personal or suspicious-reporting information.

12. Training, Compliance Monitoring and Management Reporting

12.1 Training

Relevant staff in Risk and Sustainability, Investments, Procurement, Legal, Finance and Internal Audit shall receive induction and periodic training. Training shall cover the due-diligence workflow, risk scoring, EDD triggers, sanctions/PEP screening, red flags, escalation, confidentiality and tipping off.

12.2 Compliance Monitoring

The Head of Risk and Sustainability/AMLRO shall conduct or arrange periodic sample reviews of completed files. Monitoring should test whether the correct due-diligence level was applied, evidence supports the score, screening is documented, approvals are independent, conditions are tracked, refreshes are timely and the register is complete.

12.3 Management and Committee Reporting

Risk and Sustainability shall provide periodic aggregated reporting to senior management and the Board Risk and Compliance Committee. Reporting should include:

- number and type of assessments completed;
- risk-rating distribution and high-risk/PEP cases;
- EDD cases and approval outcomes;
- overdue reviews and outstanding conditions;
- screening matches and material red-flag themes;
- restricted, rejected, suspended or terminated relationships;
- external reports or referrals, subject to confidentiality;
- training and monitoring completed; and
- control weaknesses and remedial actions.

Internal Audit may independently test the framework in accordance with its approved mandate and report through its established arrangements.

13. SOP Governance and Review

The Head of Risk and Sustainability/AMLRO owns this SOP and shall review it every three years or when there is a material change in law, regulatory guidance, GIIF's risk profile, financing arrangements, procurement practices or the AML/CFT Policy. Material amendments shall be approved through GIIF's applicable governance process.

Where this SOP conflicts with applicable law, the law prevails and the matter shall be referred promptly to the AMLRO and Legal. Approved templates or systems may be updated without changing the control objective, required fields, approval route or record-retention obligation established by this SOP.

Annex 1. Counterparty Due-Diligence and Risk-Assessment Form

Use: Complete for each relevant counterparty. The form may be adapted to the relationship, but all applicable fields and the reason for any omission must be recorded.

A. Assessment Details

Assessment reference: ____

Counterparty legal name: ____

☐ Funding source ☐ Project sponsor/investee/borrower ☐ Procurement/contracting party ☐ Other

Business owner / requesting function:

____

Prepared by and date: ____

☐ Level 1 - Simplified ☐ Level 2 - Standard ☐ Level 3 - Enhanced

Reason for selected level: ____

____

B. Basic Information and Purpose

Field	Response / evidence
Legal form / entity type	
Country and registration number	
Registered and operating address	
Regulator / licence, if applicable	
Project, procurement or funding relationship	
Purpose and expected nature of relationship	
Expected value, currency and duration	
Proposed payment account and bank	

C. Documents and Verification

Document/check	Status	Source / date / comments
Certificate or legal establishment record	☐ Received ☐ Verified ☐ N/A	
Constitutional / organisational documents	☐ Received ☐ Verified ☐ N/A	
Tax identification / statutory registration	☐ Received ☐ Verified ☐ N/A	
Relevant licence or regulatory status	☐ Received ☐ Verified ☐ N/A	
Address evidence	☐ Received ☐ Verified ☐ N/A	
Authority / signatory evidence	☐ Received ☐ Verified ☐ N/A	
Bank-account verification	☐ Received ☐ Verified ☐ N/A	

D. Ownership, Control and Key Persons

Name	Role / relationship	Ownership or control %	Verification / comments

Ownership/control structure and any exception:

____

____

____

E. Screening Record

Screening category/source	Subjects screened	Date/result	Match resolution / reviewer
UN / applicable sanctions			
Ghanaian regulatory/debarment lists			
PEP screening			
Terrorism/proliferation-financing screening			
Adverse-media search			
Other required list			

F. Risk Assessment

Factor	Range	Score	Reason and evidence
Country/geography	0-3		
Entity and ownership	0-3		
Sector/activity	0-3		
PEP, sanctions and adverse information	0-4		
Value and transaction structure	0-3		
Delivery and payment channels	0-2		
Relationship and reputation	0-2		

Total score: ____

☐ Low (0-5) ☐ Medium (6-10) ☐ High (11-20)

Override or EDD trigger identified: ____

____

G. Pre-Approval / Pre-Disbursement Verification

☐ No material legal-status or ownership change - Yes ☐ No ☐ N/A

☐ Required screening is current - Yes ☐ No ☐ N/A

☐ Payment account verified - Yes ☐ No ☐ N/A

☐ Conditions satisfied - Yes ☐ No ☐ N/A

☐ No new red flag identified - Yes ☐ No ☐ N/A

Verification date, officer and comments: ____

H. Recommendation and Approval

☐ Approve ☐ Approve with conditions ☐ EDD required ☐ Defer ☐ Reject ☐ Refer to AMLRO

Recommendation and conditions: ____

____

____

Prepared by / signature / date:

____

Head of Risk and Sustainability/AMLRO review and clearance / signature / date:

____

Final approver / authority / signature / date:

____

Next review date: ____

Annex 2. Enhanced Due-Diligence and Approval Form

Assessment reference and counterparty:

____

Business owner: ____

A. EDD Trigger

☐ High risk score ☐ PEP ☐ Higher-risk jurisdiction or sector ☐ Complex/opaque ownership

☐ Adverse media ☐ Unusual funding/payment structure ☐ Information discrepancy or reluctance ☐ Other red flag

Trigger details: ____

____

____

B. Additional Measures

Measure	Evidence/source	Finding
Additional identity/legal verification		
Ownership/control verification		
Source of funds / source of wealth		
Regulatory/enforcement checks		
Commercial rationale and transaction review		
Site visit / management meeting		
Independent confirmation		
Contractual or monitoring controls		

C. Residual Risk and Decision

☐ Low ☐ Medium ☐ High ☐ Unacceptable

Residual-risk rationale: ____

____

____

☐ Approve ☐ Approve with conditions ☐ Defer ☐ Reject ☐ Refer for suspicious activity assessment

Conditions and enhanced monitoring: ____

____

____

Prepared by / signature / date:

____

Head of Risk and Sustainability/AMLRO review / signature / date:

____

Senior approval / authority / signature / date:

____

Annex 3. Due-Diligence Register

Maintain one row per counterparty assessment. Store sensitive supporting documents and STR/SAR information separately under restricted access.

Ref.	Counterparty / category	Relationship / owner	DD level	Initial / current rating	Screening / EDD result	Decision / conditions	Approval date	Next review	Status / action

Document Control

Document control	Details
Document owner	Compliance Manager / AML Reporting Officer
Responsible function	Risk and Sustainability
Approval authority	Chief Executive Officer
Version	Draft 1.0
Review cycle	Every three years or following a change in the GIIF AML/CFT Policy

Approval Record

Authority	Name	Signature	Date
GIIF Chief Executive Officer	Nana Dwemoh Benneh		24/08/2026