



Anti-Money Laundering and KYC Notice

Version 2.0 | Effective 5 October 2026

Why we check who you are and where your money comes from, and what the law requires us to report.

In short

The law requires these checks for every client. They do not mean we suspect you of anything.

- We confirm your identity, usually with your National Identification Number, before we register you or lend.
- Loans are paid out and repaid only through mobile money or bank, so every shilling leaves a record.
- We may ask where your money comes from, especially for larger loans or unusual payments.
- If we cannot verify the information we need, we cannot register you or lend to you.
- We keep these records for at least 10 years and report suspicious activity to the Financial Intelligence Authority.

Part 1: Why we ask these questions

Alana Uganda Limited, trading as Goodname Finance, must take steps to stop its services being used for money laundering, terrorist financing or fraud. We follow the **Anti-Money Laundering Act, 2013** as amended, the Anti-Money Laundering Regulations made under it, the Anti-Terrorism Act, 2002, and the guidance of the **Financial Intelligence Authority (FIA)**, Uganda's financial intelligence unit.

These laws require us to know who our clients are, understand the purpose of each loan, watch for unusual activity and report suspicions. The checks apply to everyone.

Part 2: Knowing our clients

Before we register you or lend, we carry out customer due diligence:

- **Individuals:** we record your full name, date of birth, NIN or other official identity document, photograph, address and phone number. We verify your NIN with the National Identification and Registration Authority where we can. We check that the mobile money number or bank account you give us is registered in your name, and we ask about your work and source of income.
- **Groups:** we obtain the group's constitution or registration, its resolution to borrow, the details of the group's own account, and the identity of its officials and of the members who sign for it.
- **Businesses and organisations:** we obtain the certificate of registration, the constitution or memorandum and articles, the resolution to borrow, the TIN, and the identity of directors, signatories and the people who own or control it.

- **Guarantors and people who recommend you:** we confirm their identity and how they know you.

Part 3: Acting for someone else

Tell us if you are applying for someone else, or if another person will benefit from or control the loan. We need to identify that person too. For an organisation, we identify every individual who ultimately owns or controls it.

Part 4: Politically exposed persons

Tell us if you hold, or have held, a prominent public position in Uganda or another country, such as a senior government, judicial, military, political party or state enterprise role. Tell us also if you are a family member or close associate of such a person. This does not stop you from borrowing, but the law requires us to make extra checks, including on the source of funds, and a senior manager must approve the relationship.

Part 5: Extra checks

We may ask for more information, such as bank or mobile money statements, proof of where your money comes from, or evidence of what the loan is for, when:

- the amount is large compared with your income or business;
- a loan is repaid early from an unexpected source or by someone else;
- the ownership of an organisation is complex or unclear;
- a person or country involved is considered high risk; or
- the information we hold is inconsistent or out of date.

Part 6: Sanctions screening

We check clients, guarantors and the owners of organisations against the sanctions lists of the United Nations Security Council and lists issued by the Government of Uganda. We do not lend to, or accept payments from, anyone on those lists, and we report any match as the law requires.

Part 7: Ongoing monitoring

We keep your details up to date and review them from time to time, more often for higher risk relationships. We watch repayments for unusual patterns. Tell us when your name, address, phone number, employer or business changes.

Part 8: How money moves

Official channels only

- Every loan is paid out, and every instalment is collected, through IOTec Pay (MTN Mobile Money, Airtel Money or bank). We never pay out or collect a loan in cash.
- The only payment we accept in cash is the one-off onboarding fee at registration, and only against an official receipt with a reference number.

- We never ask for a fee to approve or release a loan. Anyone asking you to send money to a personal number to get a loan is not acting for us. Report them to us and to the police.

Part 9: Reporting to the authorities

The law requires us to report suspicious transactions, and certain other transactions, to the Financial Intelligence Authority. The law also forbids us from telling the person concerned that a report has been made or is being considered.

We may also share information with the Financial Intelligence Authority, the police or a court when the law requires it.

Part 10: Keeping records

We keep identity documents, due diligence records and transaction records for at least 10 years after the relationship ends or the transaction is completed, as the Anti-Money Laundering Act, 2013 requires. These records are protected as our Privacy Policy describes.

Part 11: If we cannot verify you

If you do not give us the information or documents we need, or we cannot verify them, we cannot register you or lend to you. For an existing client we may stop further lending until the information is provided. In some cases the law may require us to end the relationship or make a report, and we may not be able to tell you why.

Part 12: Your personal data

We process the information collected under this notice because the law requires it. We use it for these checks and for the loan you ask for, and handle it as our Privacy Policy describes.

Part 13: Contact our compliance team

Send questions about this notice to our compliance team through any of the channels below, and write Compliance in the subject line. The team reports to our Money Laundering Reporting Officer.

Compliance

Alana Uganda Limited

WhatsApp: +256778461421

Email: support@goodnamefinance.com

Office hours: Monday to Friday, 8:00am to 5:00pm (EAT)

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