YOUNG MINDS INVESTING LTD

Legal & Compliance Framework

Company	Young Minds Investing Ltd
Legal Structure	Private Limited Company (Ltd)
Founder	Burhan Sherdel
Jurisdiction	England and Wales

1. Purpose

This Legal & Compliance Framework establishes the principles Young Minds Investing Ltd ("YMI" or "the Company") intends to follow when conducting its business and investment activities.

Its purpose is to establish appropriate controls around:

- Legal compliance
- Financial regulation
- Investment activity
- Financial promotions
- Investor relationships
- Conflicts of interest
- Financial crime
- Data protection
- Cybersecurity
- Governance
- Record keeping

2. Company Structure

YMI operates as a private limited company.

YMI is not a sole trader business.

The Company should maintain appropriate:

- Statutory records
- Accounting records
- Shareholder records
- Director records
- Contracts
- Investment records
- Corporate filings

3. Regulatory Perimeter

YMI must identify exactly which activities it intends to conduct.

Depending on the business model, activities such as:

- Investment management
- Investment advice
- Arranging investments
- Dealing
- Financial promotions
- Holding client money
- Holding client assets
- Operating pooled investment arrangements

may be regulated activities.

YMI must not assume that an activity is unregulated simply because the Company is small or privately owned.

4. FCA Position

YMI must determine whether its proposed activities require:

- FCA authorisation
- Registration
- An exemption
- An appointed representative arrangement
- Another lawful regulatory basis

YMI must not describe itself as FCA-authorised unless that status has actually been obtained.

5. Financial Promotions

YMI must ensure that investment-related promotional communications comply with applicable requirements.

Where applicable, communications should be:

- Fair
- Clear
- Accurate
- Balanced
- Not misleading

YMI must not make misleading claims about investment returns or guarantee profits.

6. Investor and Client Money

YMI must not hold, control or transfer client or investor money unless its legal and regulatory position permits this and appropriate controls are in place.

Company money must remain separate from money that legally belongs to clients or investors.

7. Anti-Money Laundering

Where applicable, YMI should maintain appropriate:

- Customer due diligence
- Identity verification
- Source-of-funds procedures
- Source-of-wealth procedures
- Suspicious-activity escalation
- Record keeping

YMI must not knowingly facilitate financial crime.

8. Sanctions

YMI should take appropriate measures to avoid prohibited transactions involving sanctioned individuals, entities or jurisdictions where applicable.

9. Conflicts of Interest

All shareholders, directors and relevant personnel must disclose actual, potential or perceived conflicts.

Conflicts should be recorded and appropriately managed.

10. Confidentiality

Confidential YMI information must be protected.

This includes:

- Investment research
- Strategies
- Portfolio information
- Investor information
- Financial information
- Business plans
- Passwords
- Proprietary models
- Internal communications

11. Intellectual Property

YMI's intellectual property should be appropriately protected.

This may include:

- The Young Minds Investing name
- YMI branding
- Logos
- Websites
- Investment research

- Models
- Presentations
- Business materials
- Other intellectual property

The ownership and licensing of intellectual property should be formally documented.

12. Data Protection

YMI should handle personal information securely and lawfully.

Appropriate controls should cover:

- Access
- Storage
- Retention
- Privacy
- Data sharing
- Security
- Data breaches

13. Financial Controls

YMI funds must only be used for legitimate Company purposes.

Controls should cover:

- Bank accounts
- Payment approvals
- Expenses
- Accounting
- Investment transactions
- Distributions
- Access to financial systems

No shareholder may treat Company funds as personal funds.

14. Cybersecurity

YMI should maintain appropriate cybersecurity measures including:

- Strong passwords
- Multi-factor authentication
- Restricted access
- Secure devices
- Backups
- Software updates
- Procedures for compromised accounts

15. Compliance Incidents

Material compliance incidents should be:

1. Identified.
2. Recorded.
3. Investigated.
4. Escalated.
5. Corrected where possible.
6. Reviewed to prevent recurrence.

Where legally required, appropriate authorities should be notified.

16. Complaints

If YMI's activities create applicable complaint-handling obligations, the Company should maintain a formal complaints process covering:

- Receipt
- Acknowledgement
- Investigation
- Response
- Escalation
- Record keeping

17. Whistleblowing

YMI should provide an appropriate mechanism for raising serious concerns regarding:

- Fraud
- Misconduct
- Financial crime
- Regulatory breaches
- Misuse of Company funds
- Other serious compliance matters

18. Compliance Review

YMI should review its legal and compliance position whenever:

- Its business model changes
- It begins offering a new service
- External capital is introduced
- New investors are accepted
- Regulations change
- A material compliance incident occurs

19. Final Compliance Principle

YMI will only conduct activities that are legally permitted under its current structure and applicable UK law.

Incorporation as a private limited company does not itself constitute FCA authorisation.

Approved by:	Burhan Sherdel
Position:	Founder / Shareholder
Date:	_____
Signature:	_____