ZUERON
Bridging Futures

CONTINUOUS SEARCH FOR OPPORTUNITIES

COMPANY PROFILE 2026

AI-Driven **AML Compliance**, Training & **Data Analytics**

Zueron Limited serves Financial Intelligence Units, supervisors and reporting entities across Kenya and th wider East African market, turning financial crime d into intelligence that can be analysed, disseminated acted upon.

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NAVIGATE THIS DOCUMENT

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This profile sets out who Zueron is, the pressures facing Financial Intelligence Units and reporting entities alike, and the three connected capabilities we bring to both: intelligence and AML advisory, accredited training, and data analytics engineering.

READ THIS PAGE FIRST

Executive **Summary**

FOR FINANCIAL INTELLIGENCE UNITS

You receive more STRs, CTRs and cross border reports than your analyst headcount can work. Zueron builds the analytical layer that turns that inflow into disseminable intelligence: automated triage and prioritisation of reports, entity resolution across reporting entities, network and typology detection, country and corridor mapping, virtual asset tracing, and case packaging for law enforcement and prosecutors. We do not replace the analyst. We remove the work that stops the analyst from analysing.

FOR REPORTING ENTITIES

You carry obligations you must be able to evidence: a documented risk assessment, working screening and monitoring, trained staff and accurate, timely reporting to the FIU. Zueron designs the programme, deploys the platform that runs it, trains the people who operate it, and tunes the models that keep report quality high enough that your submissions are usable at the other end.

WHAT WE DO, IN ONE LINE EACH

AML Advisory

Strategic analysis frameworks, feedback loops and supervisory methodology for FIUs. Risk assessment, framework design, independent audit and remediation for reporting entities.

Compliance Training

Analyst tradecraft, typology and virtual asset investigation curricula for FIUs. Role based, board to front line certification for reporting entities.

Data Analytics & AI

Large scale STR and CTR analysis, network graphs, country mapping and blockchain tracing. Detection models, rule tuning and reporting pipelines.

WHY NOW

FATF	**VASP**	**USD 19bn**	**CTR+STR**
KENYA REMAINS UNDER INCREASED MONITORING	REGULATIONS GAZETTED JULY 2026, LICENSING OPENS	CRYPTO INFLOWS TO KENYA, JULY 2024 TO JUNE 2025	REPORT VOLUMES RISING FASTER THAN ANALYST CAPACITY

The rest of this document sets out how we do each of these. If you read nothing else, the two boxes above are the offer. Contact details are on the final page.

SECTION 01

Zueron **at a Glance**

Zueron Limited is a Nairobi based technology and regulatory advisory firm working at the intersection of financial crime intelligence, professional training and applied data science. We serve two connected constituencies: **Financial Intelligence Units and supervisory authorities**, whose mandate is to receive, analyse and disseminate financial intelligence, and the **reporting entities** whose STRs, CTRs and cross border reports feed them.

03	STR/CTR	20+	EAC
INTEGRATED PRACTICE LINES	ANALYSIS AT NATIONAL SCALE	INSTITUTIONAL PARTNERS	REGIONAL DELIVERY REACH

Intelligence & Compliance Advisory

FIUs: analysis methodology, strategic assessment and reporting entity feedback frameworks. **Reporting entities:** AML, CFT and CPF programmes designed and independently reviewed against POCAMLA and FATF expectations.

Accredited Training

FIUs: analyst tradecraft, typology and blockchain investigation curricula. **Reporting entities:** role based certification from board to front line, with audit ready competence evidence.

Data Analytics & AI

FIUs: large scale STR and CTR analysis, entity resolution, network graphs and country mapping. **Reporting entities:** detection models, risk scoring and reporting pipelines.

REGISTERED OFFICE

Suite B1, Wu Yi Plaza, Galana Road, Kilimani, Nairobi, Kenya

PRACTICE FOCUS

FIUs and supervisors, banking, fintech, virtual assets, insurance, SACCOs, DNFBPs

DELIVERY

On site, hybrid and managed service across Kenya, the EAC and the Gulf corridor

SECTION 02

About Us: **Bridging Futures**

Zueron partners with ambitious enterprises in fast evolving, high stakes industries. We deliver solutions that blend advanced technology with deep regulatory expertise, equipping clients with the strategic insight, operational frameworks and forward looking tools they need to manage complex requirements with confidence.

In an era where data, technology and market dynamics intersect, narrow financial tactics fall short. Compliance is no longer a back office cost centre. Handled well, it is a licence protector, a trust signal to correspondent banks and investors, and a source of hard operating intelligence about the business itself.

That belief shapes everything we build. We turn regulatory challenge into competitive advantage, freeing our clients to focus on innovation and long term value creation.

> *We grow through creativity, simplicity and trust. We integrate honesty, integrity and business ethics into all aspects of our business functions.*

OUR VISION

To be recognised as East Africa's most trusted partner for intelligent compliance: the firm institutions call when the regulatory stakes are highest.

OUR MISSION

To deliver superior products and services that continuously meet or exceed client expectation, through exceptional client care, innovative technology and professional services solutions.

01

Integrity

Built on honesty, transparency and self respect in every engagement.

02

Rigour

Work that withstands regulatory inspection, audit and board scrutiny.

03

Practicality

Trade offs made explicit. We do not sell perfect solutions, we deliver workable ones.

04

Partnership

On the ground support, not a report delivered and a team withdrawn.

SECTION 03

Leadership & **Governance**

Zueron is led by a small, accountable team. Engagements are owned at director level from first meeting to final handover, so clients deal with the people who carry responsibility for the outcome rather than a rotating account layer.

CO

Cliff Ogoda

CHIEF EXECUTIVE OFFICER

Sets the firm's strategic direction across the three practice lines and carries ultimate accountability for delivery quality, client outcomes and the standards to which Zueron work is held. Leads senior client and regulator facing engagement, and chairs the internal review through which every advisory deliverable passes before it reaches a client.

cogoda@zueron.com

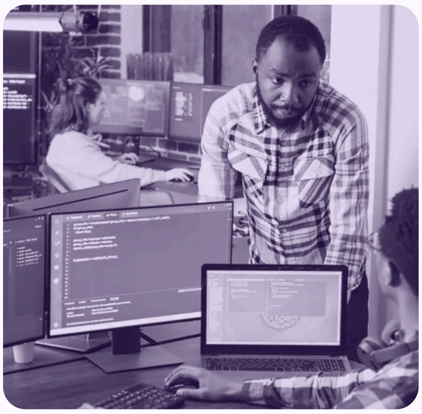
PN

Peter Kibaki Njoroge

BUSINESS DEVELOPMENT

Leads market engagement, partnerships and the commercial structuring of client mandates across banking, fintech, virtual assets and the designated non-financial sectors. Works with prospective clients to scope the right combination of advisory, platform and training, and manages the alliance relationships through which Zueron delivers.

kibaki@zueron.com



HOW WE GOVERN THE WORK

Director led delivery

Every mandate has a named director accountable for scope, quality and timeline.

Independent review

Advisory output is reviewed by a second practitioner before release to the client.

Conflict and ethics checks

Engagements are screened for conflict, and independence is preserved where we audit.

Advisory Practice

Financial crime specialists delivering risk assessment, framework design and audit.

Academy Faculty

Active practitioners who train, drawn from compliance and enforcement backgrounds.

Data & Engineering

Analysts and engineers building models, pipelines and platform integrations.

Alliance Network

Technology and training partners extending reach across the Gulf corridor.

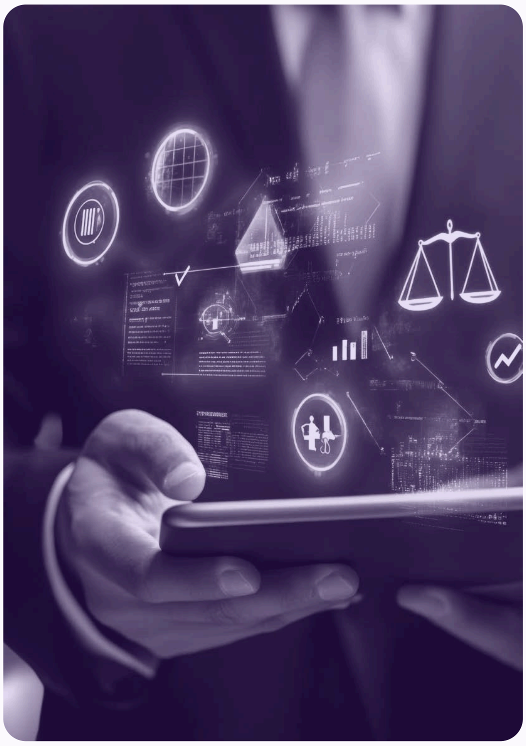
SECTION 04

The Intelligence & **Compliance Imperative**

Kenya remains on the FATF list of jurisdictions under increased monitoring, and appears on the European Commission's list of high risk third countries. Neither listing is a sanction, but both change the operating environment: correspondent banks apply sharper country risk inputs, due diligence costs rise, cross border corridors attract closer scrutiny, and investors price in regulatory uncertainty.

Domestically the direction is unambiguous. The amended POCAMLA has widened obligations, supervisory scope now reaches designated non-financial businesses and professions, beneficial ownership transparency is enforced, and virtual asset service providers have moved into a formal licensing regime, adding an entirely new class of reporting entity.

The pressure lands on both sides of the reporting relationship, and in both cases the gap is not awareness. It is execution capacity.



FIU: Analytical Capacity Gap

Report inflow grows every year while analyst headcount does not. Intelligence value is lost not because reports are absent but because there is no capacity to analyse them at the volume received.

FIU: Effectiveness Under Assessment

Mutual evaluation tests outcomes, not paperwork. Immediate Outcome 6 asks whether financial intelligence is actually used, which requires demonstrable analysis, dissemination and law enforcement uptake.

Entities: Penalties and Enforcement

Failures in AML, CFT, CPF and sanctions controls can lead to monetary penalties, licence conditions, directions to remediate and public enforcement notices, alongside reputational and correspondent banking damage.

Entities: Report Quality Burden

Defensive over reporting floods the FIU while under reporting hides risk. Both are supervisory findings, and both stem from monitoring calibrated without evidence.

THE ZUERON RESPONSE

We close the execution gap on both sides: an analytics capability that lets an FIU work the volume it actually receives, an advisory practice that designs and remediates the programmes generating those reports, and an academy that builds the competence to sustain both.

SECTION 05

The FIU Mandate: **Receive, Analyse, Disseminate**

A Financial Intelligence Unit sits at the centre of the national AML, CFT and CPF architecture. Its statutory function is to receive reports from obliged entities, analyse them, and disseminate financial intelligence to law enforcement, prosecutors, supervisors and counterpart FIUs. Zueron organises its entire offer around those three verbs, plus the strategic and feedback functions that sustain them.

FUNCTION 01

Receive

Intake of STRs, CTRs, cross border declarations and wire transfer reports from banks, mobile money operators, remittance providers, VASPs, insurers, SACCOs and DNFBPs.

- goAML compatible XML validation and ingestion pipelines
- Bulk CTR loading from high volume mobile money and banking sources
- Automated completeness, format and data quality scoring at intake
- Reporting entity performance dashboards and rejection feedback

FUNCTION 02

Analyse

Operational analysis of individual cases and strategic analysis of patterns, trends and systemic vulnerabilities across the whole reporting population.

- Automated triage and risk ranking of incoming reports
- Entity resolution linking one subject across many reporting entities
- Network graphs exposing structuring, layering and mule rings
- Blockchain tracing and typology detection at national scale

FUNCTION 03

Disseminate

Delivery of actionable intelligence to law enforcement, prosecutors, tax and asset recovery agencies, supervisors and counterpart FIUs.

- Structured case packaging with evidence trail and analyst narrative
- Secure controlled dissemination with recipient audit logging
- Egmont Group style exchange formatting for counterpart FIUs
- Outcome tracking so dissemination value can be measured

SUPPORTING FUNCTION: STRATEGIC ANALYSIS

National and sectoral risk assessment inputs, emerging typology publication, red flag guidance for reporting entities, and trend reporting to inform policy and supervisory priorities.

SUPPORTING FUNCTION: FEEDBACK AND SUPERVISION

Structured feedback to reporting entities on report quality and usefulness, compliance monitoring of reporting obligations, and the analytics to identify under reporting and defensive reporting alike.

The recurring constraint. FIUs across the region report the same problem: report volumes grow every year while analyst headcount does not, so a rising share of intelligence value never gets extracted. The answer is not more analysts alone. It is automating intake, triage and link discovery so that scarce analyst time is spent on judgement rather than collation.

SECTION 06

Our Positioning: **Three Connected Pillars**

Most providers offer one of these. Advisory firms write methodology but cannot build systems. Software vendors ship platforms but leave the institution to interpret the regulation. Training houses certify people who return to unchanged processes. Zueron delivers all three as one engagement, and maps each to the specific functions of an FIU as well as to the obligations of a reporting entity.

01

AML Compliance Consulting

FIU: operational and strategic analysis methodology, dissemination and feedback frameworks, national risk assessment input, Egmont readiness.

Entities: risk assessment, framework design, independent audit, MLRO support, remediation, licensing.

ADVISORY

02

Compliance Training

FIU: analyst tradecraft, typology recognition, financial investigation, blockchain tracing and intelligence report writing.

Entities: role based curricula from board to front line, certification and CPD tracked completion records.

ACADEMY

03

Data Analytics & AI Solutions

FIU: STR and CTR ingestion at scale, automated triage, entity resolution, network graphs, country mapping, blockchain tracing, case packaging.

Entities: monitoring tuning, risk scoring, reporting pipelines, dashboards.

ENGINEERING

DELIVERED AS ONE ENGAGEMENT

The same risk criteria drive the advisory framework, the training curriculum and the analytical models. A typology identified in analysis becomes a red flag in the curriculum and a detection rule in the platform within the same programme of work.

MEASURED ON OUTCOMES

For an FIU, success is intelligence disseminated and acted upon, not reports received. For a reporting entity, it is a programme that survives inspection. Both are measurable, and both are what we contract against.

BUILT TO HAND OVER

Methodology, models and curricula are documented and transferred. The capability stays with your analysts and your compliance team when the engagement closes, rather than leaving with us.

RECEIVE — ANALYSE — DISSEMINATE

Intelligence & Financial Crime **Advisory**

Our advisory practice combines regulatory expertise, industry insight and technology capability. For FIUs we work on analysis methodology, dissemination and feedback. For reporting entities we work from the institution's own risk profile outward, so controls are proportionate, defensible and operable by the team expected to run them.

Risk Assessment & NRA Support

National and sectoral risk assessment support for FIUs and supervisors, and institution wide ML, TF and PF assessment for reporting entities, on a scored and documented methodology.

Framework & Policy Design

AML, CFT, CPF and sanctions policy suites, KYC and CDD standards, EDD protocols, PEP handling, escalation matrices and record keeping standards.

Analysis Methodology & Audit

For FIUs, design and review of operational and strategic analysis methodology and dissemination protocols. For entities, independent testing against POCAMLA, regulator guidance and FATF recommendations.

Analyst & MLRO Support

Embedded analytical and compliance resource, analyst and MLRO mentoring, board, committee and inter agency reporting packs, and interim cover during transition.

Backlog & Look Back Clearance

Clearance of unanalysed report backlogs for FIUs, and closure of supervisory findings, KYC remediation and historic alert look back reviews for entities.

Licensing & Authorisation

Application support for payment, remittance, credit and virtual asset licences, including compliance manuals, governance structures and regulator engagement.

WHO WE SERVE

- FINANCIAL INTELLIGENCE UNITS
- SUPERVISORS & REGULATORS
- LAW ENFORCEMENT & ASSET RECOVERY
- BANKS
- MICROFINANCE
- SACCOS
- PAYMENTS & PSPS
- REMITTANCE
- VIRTUAL ASSETS
- INSURANCE
- CAPITAL MARKETS
- REAL ESTATE
- LEGAL & ACCOUNTANCY
- CASINOS & GAMING
- PRECIOUS METALS
- NPOS

The FIU sees every one of these sectors through the reports they file. We work both ends of that relationship: the analytical capability to make sense of the inflow, and the programmes inside reporting entities that determine its quality.

SECTION 08

The AI-Driven **AML Platform**

Zueron deploys and configures an end to end, AI driven AML platform: a single environment covering onboarding, screening, risk scoring, transaction monitoring, case management and regulatory reporting. Built by a multidisciplinary team of legal, compliance and anti financial crime practitioners, it is proven in regulatory inspections and audits.

EIGHT CORE PROCESSES, ONE SYSTEM OF RECORD

Onboarding
Seamless digital KYC, e-KYC and document capture.

Screening
Real time sanctions, PEP and adverse media screening.

Risk Management
Dynamic risk engine with intelligent, adaptive scoring.

Transaction Monitoring
Automated rules and behavioural anomaly detection.

Case Management
Streamlined alert triage, investigation and escalation.

Reporting
Instant STR, CTR and supervisory reporting output.

Training
Certified learning tracked against every user role.

Advisory
Expert practitioner support embedded in the workflow.

FIRST COMPLIANCE
total compliance, total security

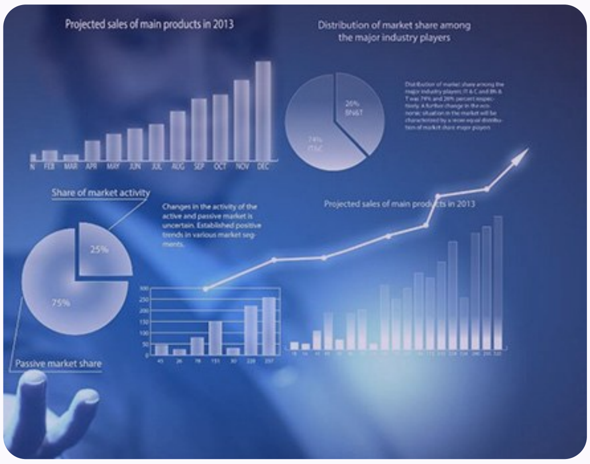
Delivered in alliance with First Compliance, whose AML platform is ISO 27001:2022 and ISO 9001:2015 certified and deployable in cloud or on premise configurations. Zueron leads local configuration, data migration, rule tuning and regulator facing documentation.

SECTION 09

Platform **Capability Set**

A unified environment for compliance, due diligence and risk management. It replaces the spreadsheet plus inbox plus point solution stack that most institutions still run, and produces the audit trail supervisors ask for.

- Unified compliance platform spanning AML, KYC and due diligence
- Dynamic risk engine with intelligent, configurable scoring
- AI powered risk mitigation, prediction and analytics
- Advanced transaction monitoring and alert management
- Adverse media and sanctions screening with AI assisted matching
- Enhanced due diligence and beneficial ownership tracing
- Client profile behavioural analytics
- Automated ongoing monitoring and bulk re-screening
- Trade based money laundering detection
- Comprehensive audit trail and regulatory reporting
- Configurable workflows, escalation and compliance alerts
- e-KYC and open API integration with core banking and payment rails
- Document expiry tracking and proactive remediation prompts
- Cloud and on premise deployment flexibility



BENEFIT SUMMARY

The platform unifies compliance and due diligence, streamlines workflow, automates AML procedure and removes manual effort, releasing compliance teams to concentrate on risk prevention, regulatory assurance and sustainable growth.

DEPLOYMENT OPTIONS

CLOUD HOSTED
ON PREMISE
HYBRID
DATA RESIDENT IN KENYA

SECTION 10

Comparative **Advantage**

A complete, intelligent and adaptable ecosystem, combining automation, flexibility and regulatory precision against the fragmented tooling most institutions inherit. The first block addresses the FIU analytical mandate, the second the reporting entity obligation set.

FINANCIAL INTELLIGENCE UNIT CAPABILITY

CAPABILITY	ZUERON	TYPICAL MARKET TOOLING
Bulk ingestion and validation of STR, CTR and cross border report feeds	✓	Manual intake, limited format validation
Automated triage and risk ranking of incoming reports	✓	First in first out queues, analyst discretion
Entity resolution linking one subject across many reporting entities	✓	Name search only, duplicates unresolved
Network and link analysis at national dataset scale	✓	Single case view, no cross report linkage
Country, corridor and cross border flow mapping	✓	Static country lists without observed behaviour
Blockchain and virtual asset tracing correlated with fiat reports	✓	Absent or handled as a separate silo
Structured case packaging and controlled dissemination with audit log	✓	Document assembly by hand, weak recipient tracking
Reporting entity feedback and report quality analytics	✓	Little or no structured feedback loop
Strategic analysis and typology trend production	✓	Operational focus only

REPORTING ENTITY CAPABILITY

CAPABILITY	ZUERON	TYPICAL MARKET TOOLING
End to end unified platform covering AML, KYC and due diligence	✓	Fragmented or standalone modules
Automated and dynamic risk engine with intelligent scoring	✓	Limited or predefined scoring logic
Advanced transaction monitoring and alert management	✓	Manual or basic monitoring setup
AI powered adverse media and sanctions screening	✓	Basic screening or priced as an add-on
EDD reports with risk profiling, ownership tracing and source of funds validation	✓	Static EDD forms without data enrichment
Trade based money laundering detection	✓	Manual or limited cross checking
Comprehensive audit trail and regulatory reporting	✓	Partial or manual reporting
Local advisory and training wrapped around the technology	✓	Software licence only, no local practice

SECTION 11

Risk Criteria & **Classification Framework**

Risk language only works if it is defined. The criteria below are the baseline we apply in risk assessment, customer scoring, report triage and model design. They are calibrated to each institution and, for FIUs, to national risk assessment findings.

RATING	CUSTOMER AND RELATIONSHIP INDICATORS	TREATMENT
HIGH	Foreign PEPs and close associates, complex or opaque ownership, bearer instruments, cash intensive business, non face to face onboarding from higher risk jurisdictions, VASP and unhosted wallet exposure, correspondent and nested relationships, adverse media of financial crime nature	Enhanced due diligence, senior management approval, source of funds and source of wealth verification, review at least annually or on trigger
MEDIUM	Domestic PEPs in lower exposure roles, moderate cash usage, cross border activity within established corridors, sectors with elevated but managed inherent risk, moderate transaction variance against profile	Standard due diligence with targeted enhancement, periodic review on a defined cycle, tighter monitoring thresholds
LOW	Salaried domestic individuals, regulated and listed entities, public bodies, transparent ownership, activity consistent with a stable declared profile	Simplified due diligence where permitted, longer review cycle, standard monitoring

Money laundering risk

Scored across placement, layering and integration exposure. Indicators include structuring below thresholds, rapid pass through, round sum activity, dormant account reactivation and third party settlement.

Terrorism financing risk

Low value, high frequency patterns, NPO and charitable flows to conflict adjacent geographies, prepaid and mobile money aggregation, and linkage to designated persons or their known associates.

Proliferation financing risk

Dual use goods trade, opaque shipping and freight forwarding intermediaries, and counterparties linked to jurisdictions subject to targeted financial sanctions.

PEP exposure

Classified by foreign, domestic and international organisation status, seniority of office, control over public funds or procurement, and family and close associate linkage, with declassification only on documented review.

Country and corridor risk

Built from FATF listings, EU high risk third country lists, sanctions regimes, corruption and governance indices, and observed corridor behaviour in the institution's own data.

Product, channel and virtual asset risk

Anonymity, speed, cross border reach and third party access. Virtual assets, mixers, privacy coins, unhosted wallets and agency channels carry defined uplift factors.

Applied to FIU triage. The same criteria drive report prioritisation. An incoming STR touching a foreign PEP, a high risk corridor and a VASP counterparty ranks above a routine threshold CTR, and the ranking is explainable, auditable and tunable rather than a matter of whichever analyst opened the queue first.

SECTION 12 | PILLAR TWO

The Zueron **Compliance Academy**

For an FIU, capability is analyst tradecraft: recognising typologies, working a network, tracing a chain and writing an intelligence report a prosecutor can use. For a reporting entity, it is a compliance culture regulators can test. Our programmes serve both, built and delivered by active practitioners rather than career trainers.

Build analyst tradecraft

Case based learning on real typologies, financial investigation technique, link analysis and intelligence report writing, with formal assessment of practical skill rather than attendance.

Stay current with regulatory change

Content reviewed against the latest circulars, guidance notes and enforcement publications. When supervisory expectations move, the curriculum moves with them.

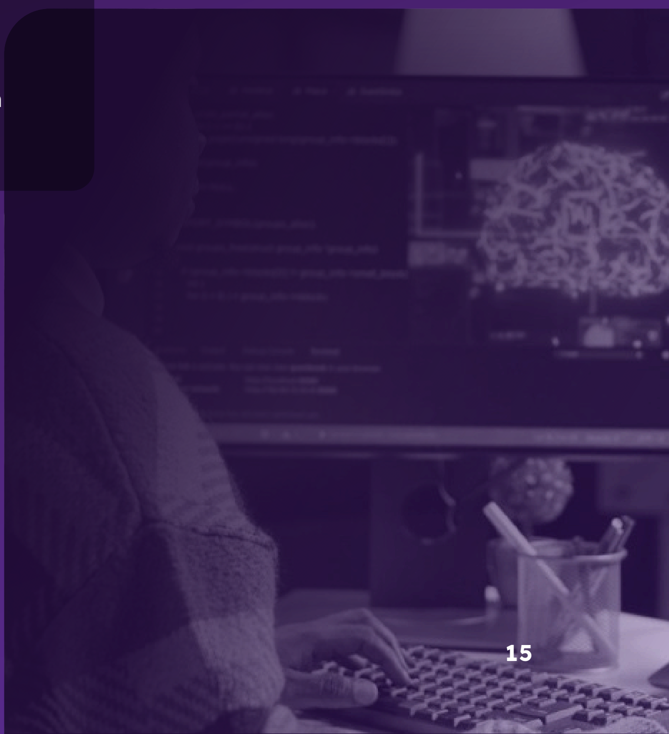
Cover the full crime spectrum

AML, CFT, counter proliferation financing, sanctions, corruption, trade based laundering, fraud and virtual asset investigation.

Foster a culture of compliance

Ethical decision making, risk awareness and accountability embedded into daily behaviour, supporting both front line staff and senior management obligations.

Delivered with Compliance360, our training alliance partner, giving clients access to group licensing, an administrator dashboard, CPD tracking and completion records suitable for regulatory examination.



SECTION 13

Programme **Portfolio**

FIU TRACK 01

Operational Analysis

Working an STR from receipt to dissemination: subject profiling, source enrichment, link building, hypothesis testing and intelligence report writing.

FIU TRACK 02

Strategic Analysis & Typologies

Working large CTR and STR datasets for pattern, trend and systemic vulnerability, producing typology guidance and national risk assessment input.

FIU TRACK 03

Virtual Asset Investigation

Blockchain tracing, address clustering and attribution, mixer and bridge behaviour, travel rule data, and correlating on chain activity with fiat reports.

ENTITY TRACK 01

Board, MLRO & Compliance

Governance and personal accountability, risk assessment methodology, alert investigation, reporting obligations and regulator engagement.

ENTITY TRACK 02

Front Line, Sanctions & Screening

Due diligence in practice, red flag recognition, escalation and tipping off, list management, name matching and false positive handling.

ENTITY TRACK 03

VASP, Fintech & DNFBP

Travel rule obligations, VASP licensing expectations, crypto to fiat corridor risk, and proportionate curricula for law firms, accountants, real estate and dealers in precious metals.

DELIVERY MODES

- In house cohort delivery at the client site
- Virtual instructor led sessions across multiple branches
- Self paced online modules with progress tracking
- Executive and board briefings, ninety minutes or half day
- Annual refresher cycles mapped to the training calendar

WHAT THE CLIENT RECEIVES

- A documented annual training plan tied to the risk assessment or FIU capability gap analysis
- Attendance and assessment records per individual
- Pass rate and competence reporting for the board pack
- Evidence pack formatted for supervisory inspection
- Certificates and CPD hours where applicable

Data Analytics, **BI & AI Solutions**

This is the pillar that matters most to an FIU. The statutory functions are to receive, analyse and disseminate, and analysis is where capacity binds. We build the layer that lets an FIU work the volume it actually receives: ingesting STRs and CTRs at scale, ranking them, resolving entities across reporting institutions, and surfacing the links no single report contains. The same capability serves reporting entities as detection, tuning and reporting infrastructure.

STR & CTR Analysis at Scale

Ingestion, validation and analysis of very large report datasets. Automated triage ranks every incoming report so analyst hours are spent on the cases carrying genuine intelligence value.

Entity Resolution & Network Analysis

Resolving one subject across many reporting entities, then graphing counterparty relationships to surface structuring, layering, mule networks and trade based laundering invisible in any single report.

Risk Scoring & Prioritisation

Transparent, testable and defensible scoring models with documented factor weightings and periodic back testing, applied to report triage for FIUs and customer risk for entities.

Monitoring Rule Tuning

Threshold optimisation and above the line and below the line testing to cut false positives while evidencing that coverage has not been weakened.

Dissemination & Case Packaging

Structured intelligence packages for law enforcement and counterpart FIUs with full evidence trail, plus automated pipelines feeding supervisory returns and executive dashboards.

AI Driven Acceleration

Large language model assisted alert narrative drafting, document extraction, adverse media summarisation and investigator copilots, with human review retained.

Governed by design. Every model carries documented assumptions, validation results, explainability notes and a review cadence. For an FIU this matters twice over: an analytical conclusion that cannot be explained cannot be defended in court, and a prioritisation rule that cannot be audited cannot be justified to an assessor.

SECTION 15

Analytics Applied: **The Cases That Matter**

FIUs and compliance teams rarely suffer from too little data. They suffer from volumes they cannot work, models they cannot explain to an assessor, and analysis assembled by hand. The cases below are where large dataset analytics changes the outcome rather than the paperwork.

USE CASE 01

Large CTR datasets linked to STRs

Millions of cash transaction reports are received but rarely mined. We link CTR volume to the STR population, exposing subjects whose declared cash activity contradicts their profile and cash aggregation that never triggered a report at all.

USE CASE 02

Cross border and corridor analysis

Mapping declared and undeclared cross border flows against corridor risk, remittance behaviour and trade data, identifying corridors where reported volume and observed economic activity do not reconcile.

USE CASE 03

Terrorism financing detection

Low value high frequency aggregation, NPO and charitable flows toward conflict adjacent geographies, and prepaid and mobile money layering, patterns that sit below every conventional value threshold.

USE CASE 04

Country mapping and geographic risk

Building a live country risk picture from FATF and EU listings, sanctions regimes and governance indices, then testing it against the flows actually observed in national report data rather than assumed.

USE CASE 05

Money laundering typologies

Structuring below thresholds, rapid pass through, trade mispricing, real estate and procurement layering, mule rings across mobile money handles, and dormant account reactivation, each modelled and tested against the data.

USE CASE 06

Report quality and data remediation

Profiling incoming report quality by entity to separate genuine suspicion from defensive filing, and clean up of the record gaps that quietly break screening, matching and analysis.

SECTION 16

Virtual Assets & **Blockchain Analytics**

Kenya's virtual asset regime is now fully operative. The Virtual Asset Service Providers Act, 2025 was gazetted in October 2025 and commenced on 4 November 2025, and the implementing Regulations were gazetted in July 2026 under Legal Notice No. 134, completing the framework and opening licensing under CBK and CMA supervision. A new class of reporting entity is arriving, and with it a category of financial intelligence that traditional monitoring cannot see.

FOR THE FIU

- On chain tracing of funds across wallets, bridges and mixers
- Clustering and attribution linking addresses to exchanges and services
- Travel rule data analysis across originator and beneficiary records
- Detection of unhosted wallet exposure and privacy coin usage
- Correlation of on chain flows with fiat STRs and CTRs to close the loop
- Sanctions screening against designated wallet addresses

FOR VASPS AND BANKS

- Licence application support under the CBK and CMA regime
- AML, CFT and CPF programme build for virtual asset activity
- Travel rule implementation and counterparty VASP due diligence
- Wallet screening and transaction risk scoring at onboarding and in flight
- Banking of VASP clients: risk framework for the correspondent side
- Prohibitions on mixer, tumbler and anonymity enhancing services

Scale of the exposure. Chainalysis recorded roughly USD 19 billion in crypto inflows to Kenya between July 2024 and June 2025, one of the largest markets in East Africa. Until now almost none of that flow generated structured reporting. As licensing brings VASPs into the reporting population, the volume and unfamiliarity of the resulting data will land on the FIU first.

Typologies we model

Peer to peer laundering, romance and investment fraud proceeds, ransomware settlement, sanctions evasion via bridges, and crypto to mobile money off ramping.

Analyst capability transfer

Blockchain investigation training so the capability sits with your analysts rather than in an outsourced dependency.

SECTION 17

Supporting **Technology Capability**

Compliance systems do not stand alone. They sit on core banking platforms, payment rails, cloud infrastructure and data pipelines. Zueron maintains the full engineering capability required to integrate, secure and operate them.

Blockchain & Virtual Assets

Custom blockchain solutions and virtual asset integration aligned with CBK, CMA and the VASP Act, 2025.

Payment Gateways

Secure, scalable payment infrastructure and integration with domestic and international acquirers.

Money Remittance

Compliant remittance platforms, including integration with global networks such as SWIFT.

Cybersecurity

Risk management, monitoring and resilient security frameworks protecting infrastructure and data.

Audits & Penetration Testing

System audits and controlled penetration testing to find weaknesses before they are exploited.

Cloud Solutions

Migration, modernisation and optimisation on AWS and equivalent platforms, with continuity planning.

DevOps & CI/CD

Automated delivery pipelines, environment control and release governance.

Bespoke Software

Systems built around the client's process rather than forcing the process to fit the software.

Governance, Risk & Compliance Platforms

Enterprise GRC implementation and optimisation of risk management frameworks.

Quality Assurance & Testing

Manual and automated testing that reduces defects and protects performance at scale.

Web, Mobile & UI/UX

Corporate platforms, customer portals and enterprise applications built for performance.

Developer Outsourcing

Single specialists or full delivery squads embedded alongside the client team.

Regulatory **Coverage**

We work to the instruments our clients are supervised against or administer, and to the international standards those instruments derive from.

KENYA

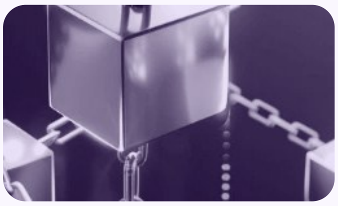
- Proceeds of Crime and Anti-Money Laundering Act, as amended
- Prevention of Terrorism Act and related regulations
- Financial Reporting Centre guidance and reporting obligations
- Central Bank of Kenya prudential and AML guidelines
- Capital Markets Authority requirements
- Virtual Asset Service Providers Act, 2025 and the 2026 implementing Regulations
- Companies Act beneficial ownership requirements
- Data Protection Act and ODPC guidance
- Insurance and SACCO sector supervisory expectations

INTERNATIONAL STANDARDS

- FATF Forty Recommendations and methodology
- FATF Immediate Outcome 6 on use of financial intelligence
- FATF mutual evaluation and ICRG action plan expectations
- Egmont Group principles for information exchange between FIUs
- Wolfsberg Group principles and questionnaires
- Basel Committee guidance on sound AML risk management
- United Nations, OFAC, EU and UK sanctions regimes

REGIONAL AND GULF CORRIDOR

- East African Community member state frameworks
- ESAAMLG regional expectations
- UAE frameworks including CBUAE, DFSA, FSRA and ADGM, through our alliance partners



Kenya's continued listing under FATF increased monitoring, alongside its position on the European Commission high risk list, means country risk is now an active input in every correspondent relationship. Institutions that can evidence a working, risk based programme protect their access to the international financial system. Those that cannot will find that access repriced or withdrawn.

SECTION 19

How We **Engage**

01

Diagnose

We establish the current position: risk profile, control inventory, open supervisory findings, data quality and team capability. Nothing is designed before the baseline is understood.

02

Design

Framework, policy, control set and target operating model, built proportionate to the risk assessment and to the resources the institution genuinely has.

03

Deploy

Platform configuration, data migration, rule set build, integration with core systems and parallel running before cutover.

04

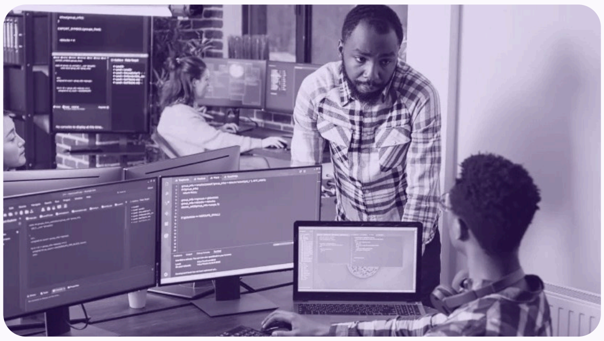
Develop

Role based training so the people expected to operate the framework can actually do so, with assessment evidence retained.

05

Demonstrate

Tuning, testing, management information and inspection readiness support, so the programme can be shown to work rather than merely asserted.



ENGAGEMENT MODELS

- Fixed scope project, milestone based
- Retained advisory, monthly capacity
- Managed compliance service
- Platform licence with implementation
- Training subscription, annual cohort

ZUERON THINKS IN TRADE OFFS

We do not sell perfect solutions. We set out what a given control choice costs in friction, resource and customer experience, and let the institution make an informed decision it can defend later.

What Sets **Us Apart**

01

Regulation and engineering in one firm

The person writing the policy sits beside the person configuring the rule engine. Requirements do not get lost in translation between a law firm, a systems integrator and a vendor.

02

Built for this market

Mobile money volumes, agency banking, informal cross border corridors and thin documentation are the normal case here, not edge cases. Controls designed elsewhere break on contact with them.

03

Evidence, not assertion

Every deliverable is built to survive an inspection: documented methodology, retained working papers, testing results and a clear audit trail from risk to control to outcome.

04

Capability transfer by default

We are not building dependence. Training, documentation and handover are contracted into the engagement so the client team can run the programme without us.

Real results, **real impact.**

Culture & **Values**

We aim to be the best at what we do. Zueron intends to grow into a global technology and compliance firm, ensuring the solutions delivered carry best practice within the chosen area of technology. We are proud to have built the organisation on the pillars of integrity, honesty and self respect.

QUALITY

Our main emphasis is to deliver the best quality in every project we undertake. Time tested methodology and a structured solution building approach maintain global standards of delivery.

TECHNOLOGY

Technology leadership is the most effective way to challenge competitors and consolidate position, because business and technology now work hand in hand.

INNOVATION

In every project we emphasise innovation. Our structured team applies methodology and knowledge to innovate and deliver excellent services.

OUR OPERATING COMMITMENTS

- Operate with complete focus on client satisfaction
- Develop mutual respect within the firm and extend it to clients
- Encourage commitment and continuous learning across the workforce
- Consistently deliver products and services of the highest quality
- Keep pace with change and strive for innovation in step with modern technology and methodology

Compliance Acumen

Thorough understanding of compliance guidelines lets us craft strategies that minimise risk, accelerate process and protect operations.

Innovative Edge

We integrate technologies such as distributed ledgers and applied AI to solve current problems and prepare for the next set.

Client Focused

We prioritise client objectives, working with architects, developers and consultants to build outcomes that lift efficiency and profitability.

SECTION 22

Partners & **Alliances**

Operating in Kenya carries a distinct set of regulatory, technical and logistical demands, particularly for international firms managing regional or global standards. Zueron helps businesses overcome these obstacles with practical, on the ground support.

From startups scaling in competitive markets to established institutions refining core strategy, our approach extends well beyond isolated advice, focusing on solutions that drive sustainable growth and efficiency.

TECHNOLOGY AND TRAINING ALLIANCES

FIRST COMPLIANCE — total compliance, total security

AI driven AML platform, ISO 27001:2022 and ISO 9001:2015 certified.

compliance 360 — your compliance training partner

Accredited compliance training, CPD tracking and corporate learning administration.

CLIENTS AND INSTITUTIONAL PARTNERS

mastercard		Umba Microfinance Bank	iNKOMOKO
KopoKopo — simple tools for your business	PHOENIX CAPITAL	BIDII CREDIT — PARTNERS FOR GROWTH	ASAP CREDIT — Borrow Confidently.
ACQUIRE CREDIT	MOTO HOPE CAPITAL — Transforming Lives	Newark Frontiers — Financing your Dreams, Supporting your Growth	MedNow

START THE CONVERSATION

Let us make your compliance **defensible**.

Whether you are preparing for a supervisory inspection, closing findings already issued, applying for a licence, or building a monitoring capability from scratch, we would welcome the opportunity to discuss the work.

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