

# Sasil SA

## SASIL S.A. Anti-Money Laundering (AML) Policy

### I. Introduction

SASIL S.A. is fully committed to conducting its business with the highest level of integrity and in strict compliance with all applicable laws and regulations, including those related to anti-money laundering (AML) and counter-terrorism financing (CTF). Money laundering is the process of concealing the illegal origin of proceeds generated from criminal activities. Terrorist financing involves providing financial support to terrorist individuals or organizations. SASIL S.A. has a zero-tolerance policy towards any activity that facilitates money laundering or terrorism financing.

### II. Scope

This policy applies globally to all SASIL S.A. employees, directors, officers, and agents, as well as subsidiaries, affiliates, joint ventures, and any other business associations or entities effectively controlled by SASIL S.A., directly or indirectly.

### III. Policy Objectives

- **Compliance:** To comply with all applicable AML and CTF laws and regulations in the jurisdictions where SASIL S.A. operates.
- **Prevention:** To prevent SASIL S.A. from being used for money laundering or terrorist financing activities.
- **Detection:** To detect and report any suspicious activity that may indicate money laundering or terrorist financing.
- **Training:** To provide ongoing training and education to employees on AML and CTF policies and procedures.

### IV. Key AML/CTF Principles

- **Customer Due Diligence (CDD):** SASIL S.A. will conduct thorough due diligence on all new and existing customers to verify their identity and assess the risk they may pose.
- **Enhanced Due Diligence (EDD):** SASIL S.A. will apply enhanced due diligence measures for high-risk customers, such as politically exposed persons (PEPs) and customers from high-risk jurisdictions.
- **Suspicious Activity Reporting (SAR):** SASIL S.A. will promptly report any suspicious activity to the relevant authorities.

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- **Record-Keeping:** SASIL S.A. will maintain accurate and complete records of all customer transactions and due diligence activities.
- **Sanctions Screening:** SASIL S.A. will screen all customers and transactions against relevant sanctions lists.

## V. Know Your Customer (KYC) Procedures

SASIL S.A. will implement robust KYC procedures to identify and verify the identity of all customers. This will include:

- **Identity verification:** Collecting and verifying customer identification documents, such as passports or driver's licenses.
- **Address verification:** Verifying the customer's residential or business address.
- **Beneficial ownership identification:** Identifying the ultimate beneficial owners of corporate entities.

## VI. Suspicious Activity Monitoring and Reporting

SASIL S.A. will monitor customer transactions and activities for any suspicious behavior that may indicate money laundering or terrorist financing. This will include:

- **Unusual transaction patterns:** Monitoring for transactions that are outside the customer's normal activity or that have no apparent business purpose.
- **Large cash transactions:** Scrutinizing large cash transactions or frequent cash deposits.
- **Suspicious wire transfers:** Monitoring wire transfers to or from high-risk jurisdictions or individuals.

## VII. Employee Training and Awareness

SASIL S.A. will provide regular training to all employees on AML and CTF policies and procedures. This training will cover:

- **AML/CTF regulations:** An overview of relevant AML and CTF laws and regulations.
- **KYC procedures:** How to conduct customer due diligence and identify suspicious activity.
- **SAR procedures:** How to report suspicious activity to the appropriate authorities.
- **Red flags:** Common indicators of money laundering or terrorist financing.

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## **VIII. Compliance Officer**

SASIL S.A. will appoint a Compliance Officer who will be responsible for overseeing the AML/CTF program and ensuring compliance with all applicable laws and regulations.

## **IX. Sanctions Compliance**

SASIL S.A. will comply with all applicable sanctions regimes, including those imposed by the United Nations, the European Union, and the United States. This will include screening customers and transactions against relevant sanctions lists.

## **X. Policy Review and Updates**

This policy will be reviewed and updated periodically to ensure that it remains current and aligned with evolving AML/CTF risks and regulatory requirements.