



SUISSEMONT & Co.

Anti-Money Laundering (AML) & Know Your Customer (KYC) Policy

Suissemont & Co is fully committed to the highest standards of integrity and compliance in preventing money laundering, terrorist financing, and other financial crimes. Our AML and KYC policies are designed to ensure strict adherence to applicable laws, regulations, and industry best practices. This policy outlines the key procedures and controls that govern our client onboarding, monitoring, and reporting processes.

I. Customer Due Diligence (CDD)

As part of our commitment to combat illicit financial activity, **Suissemont & Co** requires all clients to undergo rigorous **Customer Due Diligence** before establishing a business relationship. This process includes verifying the identity of every client through government-issued identification documents such as passports, national ID cards, or driver's licenses. Additionally, proof of residential address, such as utility bills, bank statements, or official government correspondence dated within the last three months, must be provided. We may also collect additional information depending on the nature of the client, source of funds, and risk profile to ensure full transparency and regulatory compliance.

II. Ongoing Monitoring

Suissemont & Co continuously monitors all customer transactions and account activity to identify and prevent suspicious or unusual behavior. This ongoing monitoring process employs a combination of automated tools and manual reviews to detect patterns inconsistent with the client's known profile or business activities. Any transactions that trigger alerts will be subjected to enhanced scrutiny. If any anomalies, irregularities, or red flags are identified, the account may be temporarily suspended or subject to further investigation to safeguard the integrity of the financial system and comply with regulatory requirements.

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This AML & KYC Policy is confidential and intended solely for the use of Suissemont & Co and its authorized personnel.

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Suissemont & Co complies with all applicable anti-money laundering and counter-terrorist financing laws and regulations.

III. Politically Exposed Persons (PEPs)

Clients identified as **Politically Exposed Persons (PEPs)**, or those who maintain close associations with PEPs, are subject to enhanced due diligence procedures. **PEPs** include individuals who hold or have held prominent public positions or government roles, as well as their immediate family members and close associates. Due to the increased risk of corruption or misuse of power associated with **PEPs**, **Suissemont & Co** implements additional verification checks and ongoing monitoring for such clients. Furthermore, clients connected to high-risk jurisdictions known for elevated risks of financial crime or terrorism financing are also subject to rigorous scrutiny and approval processes.

IV. Sanctions Screening

In compliance with international laws and regulatory directives, **Suissemont & Co** strictly prohibits onboarding or conducting business with individuals, entities, or jurisdictions subject to economic or trade sanctions. Our systems regularly screen all clients and counterparties against global sanctions lists issued by bodies such as the United Nations, the **U.S. Treasury Department's Office of Foreign Assets Control (OFAC)**, the **European Union**, and other relevant authorities. Any matches or potential hits are escalated for further review, and onboarding is immediately declined or terminated where applicable.

V. Recordkeeping

Suissemont & Co maintains comprehensive records of all client identification documents, transactional data, due diligence procedures, and correspondence related to **AML/KYC** compliance. These records are stored securely and retained for a minimum period of five (5) years from the date of the last transaction or termination of the client relationship, or for a longer period if required by law. Our recordkeeping processes ensure that documentation is readily accessible for audit, regulatory review, or law enforcement requests while protecting client confidentiality and data security.

VI. Reporting Obligations

In accordance with applicable laws and regulations, **Suissemont & Co** promptly reports any suspicious transactions, activities, or patterns indicative of potential money laundering, terrorist financing, or other unlawful conduct to the appropriate authorities. Our compliance team is responsible for assessing and escalating suspicious activity reports (**SARs**) in a timely and confidential manner to the relevant **Financial Intelligence Units (FIUs)** or regulatory bodies. We also cooperate fully with law enforcement agencies during investigations, providing all necessary documentation and support as required.
