

ANTI-MONEY LAUNDERING (AML) POLICY

STP 25

1. Policy Overview

STP 25 is committed to maintaining the highest standards of integrity, transparency, and compliance with applicable laws relating to anti-money laundering (AML) and counter-terrorist financing (CTF).

This policy outlines the procedures and internal controls implemented by the Company to prevent its services and operations from being used for unlawful financial activities.

2. Objective of the Policy

The objectives of this AML Policy are to:

Prevent the Company from being used as a channel for money laundering or financial crime

Establish internal procedures for identifying and mitigating risks

Promote ethical and transparent business practices

Ensure compliance with relevant regulatory expectations and international AML standards

3. Scope

This policy applies to:

All directors, employees, contractors, and representatives of STP 25

All customers, partners, and business relationships

All services, transactions, and operational activities conducted by the Company

4. Legal Compliance

STP 25 operates in accordance with applicable anti-money laundering legislation and recognized international standards aimed at preventing financial crime.

The Company ensures that its internal procedures align with legal requirements and regulatory expectations relevant to its operations.

5. Risk-Based Approach

STP 25 adopts a risk-based approach to AML compliance.

This approach involves identifying and assessing potential risks related to:

Customer profiles and ownership structures
Geographic locations of customers or partners
Nature and complexity of business relationships
Transaction patterns or unusual requests
Higher-risk situations require additional due diligence and monitoring.

6. Customer Identification and Verification

Before establishing a business relationship, STP 25 takes reasonable steps to verify the identity of its customers and business partners.

Verification may include:

Identification documents or official records
Business registration documentation for corporate clients
Information regarding beneficial ownership where applicable

7. Monitoring of Business Relationships

STP 25 conducts ongoing monitoring of business relationships to ensure that activities remain consistent with the expected purpose of the relationship.

If unusual, inconsistent, or unexplained activity is identified, additional review procedures may be applied.

8. Suspicious Activity Awareness

Employees and representatives of STP 25 are expected to remain vigilant and report any activity that appears unusual, suspicious, or inconsistent with legitimate business practices.

The Company may take appropriate internal action and cooperate with relevant authorities when necessary.

9. Record Retention

STP 25 maintains appropriate records related to:

Customer identification
Transaction details
Compliance checks

Such records are stored securely and retained for a reasonable period consistent with legal and operational requirements.

10. Staff Awareness and Compliance Culture

STP 25 promotes a culture of compliance by ensuring that employees understand the importance of AML principles and ethical business conduct.

Staff members are expected to follow internal procedures and act responsibly when identifying potential risks.

11. Confidentiality

All information collected for AML purposes is handled confidentially and used only for legitimate compliance and risk-management purposes.

Access to such information is restricted to authorized personnel.

12. Internal Oversight

Management of STP 25 maintains oversight of AML compliance procedures and ensures that internal controls remain effective.

Policies may be updated periodically to address evolving risks or regulatory expectations.

13. Zero-Tolerance Approach

STP 25 maintains a strict zero-tolerance policy toward financial crime, money laundering, fraud, and terrorist financing.

The Company reserves the right to decline or terminate business relationships where concerns regarding legitimacy or compliance arise.

14. Operational Transparency Clause (Unique Clause)

STP 25 does not engage in or support business arrangements designed to obscure ownership, misrepresent commercial activities, or create artificial structures without legitimate economic purpose.

The Company may refuse services, suspend cooperation, or terminate engagements if transparency regarding business operations or ownership cannot be reasonably verified.

This AML Policy forms part of the internal compliance framework of STP 25 and applies to all persons associated with the Company.