

Anti Money Laundering Policy

Our Principle

We exercise due diligence in the selection of our business partners. We comply with anti- money laundering regulations.

Policy

Lintec & Linnhoff Holdings Pte. Ltd. and its subsidiaries (“Lintec & Linnhoff”) complies with anti-money laundering regulations in all countries where it operates.

Implementation

Lintec & Linnhoff shall implement a **‘know your business partner’ due diligence process** to confirm the identity and legitimacy of all business partners. The extent of due diligence procedures may vary according to legal requirements and the risk profile of the transaction. At a minimum the business name, address and tax ID shall be confirmed.

Lintec & Linnhoff shall implement formal procedures to deal with unusual or suspect payment transactions. This includes procedures to block funds or return funds to the sending party. Cases of suspected money-laundering shall be escalated to the **Group Ethics and Compliance committee** and regulatory authorities will be notified if required.

Warning signs (red flags) for suspect transactions include

- payments to / from countries which are associated with money-laundering,
- payments to / from countries which differ from the registered office of the business partner (e.g., use of off-shore accounts),
- unusually complex transactions with split payments, involving different accounts in different currencies or jurisdictions,
- payments through intermediates, agents, advisors, or ‘nameless accounts’ which have no identifiable link to the customer,
- large payments in cash, cash equivalents, crypto-currencies or by money courier services,
- deficient or apparently false records to conceal the origin or destination of payments,
- over-payments with subsequent request to return or forward the money to a different account or different counter party, and
- financial transactions which are possibly linked to money laundering, criminal activities, drug trafficking or terrorism.

Record-keeping

Lintec & Linnhoff are required to maintain appropriate documents to support all payments.