



# LASCAR ELECTRONICS

## ANTI-MONEY LAUNDERING POLICY

### 1. Introduction

#### **Purpose**

This Anti-Money Laundering Policy is a guide for Lascar Electronics employees to prevent and detect money laundering. Lascar Electronics has a zero-tolerance approach to being involved in illegal or illicit activity and complies with all Anti-Money Laundering (AML) regulations where we do business.

#### **Definition**

Money laundering is the illegal process of concealing the origin of money generated by criminal activity.

#### **Scope**

This Anti-Money Laundering Policy applies to all Lascar Electronics employees regardless of employment agreement, position, or location. The policy also applies to vendors and third parties providing materials and services to the Company, such as consultants, agents, advisors, institutions and others acting on the Company's behalf. Third party affiliates are further responsible for reporting any violations of this policy they observe in dealings with the Company.

### 2. Responsibility

#### **Management**

Senior Leaders, Directors, Managers and Supervisors are tasked with implementing and overseeing procedures to ensure sufficient due diligence checks are completed on all Lascar Electronics customers.

#### **Employees**

All employees are required to maintain accurate relevant records and to report any suspicious activity to their Supervisor, Manager, Finance Director or the Compliance Officer.

### 3. Know Your Customer

Lascar Electronics must obtain and verify the identity of all new contracted customers before entering into a business relationship or executing a transaction. We will perform ongoing checks on our customers to ensure that the customer profile remains consistent with the expected activity of the customer.

### 4. Customer Due Diligence

Lascar Electronics will perform customer due diligence on all contracted customers, and will maintain appropriate records of customer identification and verification documents. If necessary, we will investigate the ownership structure of customers who have irregular arrangements.

### 5. Suspicious Activity Reporting

Lascar Electronics will train relevant employees on how to recognise and report suspicious activity. Any employee, contractor, or third-party agent who suspects money laundering or terrorist financing must report suspicions to their Supervisor, Manager, Finance Director or the Compliance Officer. Lascar Electronics will investigate all reported suspicious activity.

## 6. Disciplinary Actions

Violations of this policy could result in serious consequences for Lascar Electronics including substantial fines and prison sentences for individual employees. Lascar Electronics will investigate any violations of this policy as per procedures outlined in the employee handbook.

We may take legal action if an employee appears to have been involved in an illegal activity.

## Document Control

### Document Information

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### Owner

Name	Role	Email Address
Emma Goddard	Sustainability and Compliance Officer	emma.goddard@lascar-corintech.com

### Review and Revision History

Date	Version	Review / Changes	Author
12/07/2023	V1.0	Policy first published	Emma Goddard