

# Anti-Money Laundering Policy

## Policy Statement

SB Telecom Singapore Pte. Ltd. is a legal, ethical and transparent company, and it takes the responsibility to ensure and maintain that its assets and resources are not being used for corruption, irregularities, or money laundering. The company has taken it upon itself to detect frauds, irregularities, abuse of position, and institutional gains.

## Purpose

The purpose of this policy is to make that the company's financial processes and procedures are according to the anti-money laundering laws.

## Scope

This policy applies to every entity related to SB Telecom Singapore Pte. Ltd. and its employees, directors, officers, contractors, or any third party working on behalf of the company.

The policy is for internal use, and the administration is required to convey it to every concerned person or entity. Failure to comply with the policy will result in appropriate action.

## Money Laundering

Money laundering refers to those assets that are:

- (a) concealed or disguised; and
- (b) which are in whole or in part, directly or indirectly, representing the person's benefits from criminal conduct; and/or
- (c) may be converted or transferred or removed from the jurisdiction; or acquired, possessed or used.

. It also includes money spent for terror purposes, regardless of the means it was obtained ("**Terrorism Financing**"). Such Terrorism Financing include but are not limited to:

- (a) the act of directly or indirectly, wilfully and without lawful excuse, providing or collecting property, in whole or in part, in order to commit any terrorist act —
  - (i) with the intention that the property be used; or
  - (ii) knowing or having reasonable grounds to believe that the property will be used; or
- (b) the act of directly or indirectly, collecting property, providing or inviting a person to provide, or making available property or financial or other related services —
  - (i) intending that they be used, or knowing or having reasonable grounds to believe that they will be used, in whole or in part, for the purpose of facilitating or carrying out any terrorist act, or for benefiting any person who is facilitating or carrying out such an activity; or

- (ii) knowing or having reasonable grounds to believe that, in whole or in part, they will be used by or will benefit any terrorist or terrorist entity; or
- (c) using property, directly or indirectly, in whole or in part, for the purpose of facilitating or carrying out any terrorist act; or
- (d) possessing property intending that it be used or knowing or having reasonable grounds to believe that it will be used, directly or indirectly, in whole or in part, for the purpose of facilitating or carrying out a terrorist act; or
- (e) dealing, directly or indirectly, in any property that the person knows or has reasonable grounds to believe is owned or controlled by or on behalf of any terrorist or terrorist entity, including funds derived or generated from property owned or controlled, directly or indirectly, by any terrorist or terrorist entity; or
- (f) entering into or facilitate, directly or indirectly, any financial transaction related to a dealing in property mentioned in paragraph (e); or
- (g) providing any financial services or any other related services in respect of any property mentioned in paragraph (e) to, or for the benefit of, or on the direction or order of, any terrorist or terrorist entity.

In addition to the foregoing, property earned by using the following means is considered illegal on the ground of public policy, and it is prohibited;

- a. Money or assets received in exchange for criminal or unlawful acts. Money whose origin is not explicit or earned by assisting any activity in evading lawful means.
- b. Property gained after any criminal activity and its origin, location, and disposition are not transparent.
- c. Property which is promoting any unlawful activity
- d. Terrorism financing.

For the avoidance of doubt, "property" means:

- (a) money and all other property, movable or immovable, including things in action and other intangible or incorporeal property;
- (b) assets of every kind, whether tangible or intangible, movable or immovable, however acquired; and
- (c) legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such assets, including, but not limited to, bank credits, travellers cheques, bank cheques, money orders, shares, securities, bonds, drafts and letters of credit.

## Compliance

The company will establish a body responsible for the implementation of this policy.

The company will carry out the procedure to identify any irregularity on behalf of any stakeholder under this policy. The company should;

- a. Identify all the financiers of the company and verify their identity
- b. Take special care where stakeholders want anonymity
- c. Maintain proper records of the stakeholders

If anyone in the company knows or suspects that a person is involved in money laundering or terror financing, it is their responsibility to report such person to the body established by the company. In such a case, the company must

- a. Take the details of the people involved
- b. Verify the type of transactions
- c. Reason for suspicion
- d. The amount involved

The company must consult with the legal department before embarking on business with a third party and carefully screen such interactions.

If the company finds the counterparty engaged in the money laundering activities, the company has the right to terminate the contract with counterparty without prior notice given nor compensation for early termination.

The policy is subject to updates and amendments, which will be communicated to the stakeholder immediately.

Approved by:

SB Telecom Singapore Pte. Ltd.



(Signature)

Hayashi Tomoya

Managing Director