

Money Laundering Prevention Policy



1. Purpose and Commitment

Star Bridge Capital (“**SBCFX**”) is committed to maintaining a robust and effective framework for the prevention, detection, and reporting of money laundering, terrorist financing, and other forms of financial crime.

SBCFX adopts a **zero-tolerance approach** to the misuse of its services for illicit purposes and conducts its business in full compliance with all applicable anti-money laundering and counter-terrorist financing (“AML / CFT”) laws, regulations, rules, regulatory guidance, and international standards, as amended from time to time.

2. Regulatory and International Standards Alignment

SBCFX’s AML / CFT framework is designed in accordance with a **risk-based approach** and aligns with internationally recognised standards, including:

- The **Financial Action Task Force (FATF)** Recommendations;
- Applicable AML / CFT legislation in the jurisdictions where SBCFX is incorporated, operates, or provides services;
- Guidance and supervisory expectations issued by relevant regulatory authorities.

This Policy applies to all SBCFX employees, officers, contractors, agents, clients, products, services, and transactions.

3. Governance and Oversight

SBCFX maintains clear governance structures to ensure effective AML / CFT oversight, including:

- Board-level accountability for AML / CFT compliance;
- Designation of senior management responsible for AML / CFT implementation and effectiveness;
- Independent compliance oversight and internal controls;
- Periodic review of AML / CFT risks, policies, and procedures.

AML / CFT responsibilities are embedded across the organisation under a **three lines of defence model**, encompassing business operations, compliance oversight, and independent review.

4. Risk-Based Approach

SBCFX applies a comprehensive risk-based approach to AML / CFT, considering factors including but not limited to:

- Client type and profile;
- Jurisdictional risk;
- Products and services offered;

- Transaction size, frequency, and patterns;
- Delivery channels and payment methods.

Enhanced controls and due diligence measures are applied where higher risks are identified.

5. Customer Due Diligence (CDD) and Know-Your-Customer (KYC)

SBCFX conducts customer due diligence prior to establishing a business relationship and on an ongoing basis, which includes:

- Identification and verification of clients' identities using reliable, independent source documents or data;
- Identification and verification of beneficial owners, controllers, and authorised persons, where applicable;
- Understanding the purpose and intended nature of the business relationship;
- Enhanced due diligence for higher-risk clients, jurisdictions, or activities;
- Periodic review and updating of client information throughout the lifecycle of the relationship.

SBCFX reserves the right to request additional documentation or information at any stage, including before processing deposits, withdrawals, or other transactions.

6. Transaction Monitoring

SBCFX maintains systems, controls, and procedures designed to monitor client activity and transactions on an ongoing basis to identify unusual, suspicious, or potentially unlawful behaviour.

Monitoring measures include both automated and manual reviews, calibrated to the nature, scale, and complexity of SBCFX's operations and risk exposure.

7. Suspicious Transaction Reporting

Where suspicious activity is identified, SBCFX is legally required to:

- Conduct internal assessments and escalation;
- File reports with the relevant competent authorities in accordance with applicable laws.

SBCFX is strictly prohibited from disclosing to clients that a suspicious transaction report has been made or is under consideration ("tipping-off").

Failure to comply with AML / CFT requirements may result in account restrictions, termination, or referral to law enforcement authorities.

8. Record Keeping

SBCFX maintains comprehensive records relating to:

- Client identification and verification;
- Transaction histories;
- AML / CFT reviews, assessments, and reports.

Records are retained for a minimum of **five (5) years** following the termination of the client relationship, or longer where required by applicable law.

9. Staff Training and Awareness

SBCFX provides ongoing AML / CFT training to employees and relevant personnel to ensure they:

- Understand AML / CFT obligations and regulatory expectations;
- Are able to identify red flags and suspicious activities;
- Comply with internal escalation and reporting procedures.

Training is conducted on induction and periodically thereafter, and is tailored to the employee's role and responsibilities.

10. Information Disclosure and Regulatory Cooperation

Clients acknowledge and accept that information provided to SBCFX may be disclosed, without prior notice, to competent authorities where required by law, including authorities in:

- The jurisdiction of SBCFX's incorporation;
- The jurisdiction from which client funds originate;
- The jurisdiction to which client funds are transferred or withdrawn.

SBCFX cooperates fully with regulators and law enforcement agencies in accordance with applicable legal obligations.

11. Refusal, Restriction, and Termination of Services

SBCFX reserves the right, at its sole discretion and without prior notice, to:

- Refuse to execute transactions;
- Delay or block withdrawals;
- Suspend or restrict account activity;
- Decline to onboard a client;
- Terminate an existing business relationship,

where there is reasonable suspicion of money laundering, terrorist financing, sanctions breaches, fraud, or other criminal conduct.

SBCFX does not accept funds derived from criminal activity or engage in relationships where the underlying transactions are illegal.

12. Sanctions Compliance

SBCFX maintains controls to ensure compliance with applicable international sanctions regimes and reserves the right to restrict or terminate relationships involving sanctioned individuals, entities, jurisdictions, or activities.

13. Policy Review and Updates

This Policy is subject to periodic review and may be updated at any time to reflect changes in laws, regulations, regulatory guidance, or SBCFX's risk profile. The most current version will be published on SBCFX's website.

14. Non-Contractual Nature

This AML / CFT Policy is provided for informational purposes only and does not form part of SBCFX's Terms and Conditions of Business. It does not create contractual rights or obligations beyond those imposed by applicable laws and regulations.