

MONEY LAUNDERING AND TERRORISM FINANCING PREVENTION POLICY
(Public extract)

At SPCC, we integrate policies, guidelines, and standards into our business model to detect, mitigate, prevent, and report acts and/or transactions that could involve resources potentially obtained illegally. This is done to promote compliance with applicable regulations on the prevention of money laundering and terrorist financing, as well as to avoid potential harm to the integrity, stability, and reputation of SPCC.

Our guidelines focus on identifying and controlling risks, minimizing them, and/or eliminating them through the implementation of appropriate controls. This policy outlines the set of guidelines to prevent and detect suspicious behavior related to the prevention of money laundering and terrorist financing at SPCC.

WE ARE COMMITTED TO:

1. Providing the necessary guidelines to detect, prevent, and report suspicious behaviors or warning signs when conducting business that, by their nature, are related to criminal activities with illicit origins but are intended to appear legitimate.
2. Conducting due diligence measures on payment acceptance to reduce the risk of receiving or transferring money involved in criminal activities.
3. Implementing due diligence processes and measures for the selection of: (i) workers; (ii) business partners; and (iii) business associates.
4. Incorporating obligations related to the prevention of money laundering and terrorist financing in contracts or agreements entered into by SPCC, for both workers and third parties or business partners.
5. Planning, designing, and implementing risk management strategies to minimize and prevent potential harm to the integrity, stability, and reputation of SPCC.

SPCC workers, third parties under its control, and other third parties acting on behalf of SPCC are subject to this policy.