Anti-Money Laundering and Counter-Terrorist Financing Policy

AML/CFT

Company	EBI
Version	1.0
Effective date	April 2026
Prepared by	EBI
Approved by	Executive Management
Owner	Finance and Executive Management

This policy aims to prevent the use of EBI for money laundering or terrorist financing purposes.

1. Purpose

- Prevent the use of EBI for money laundering or terrorist financing.
- Apply a risk-based approach to clients, suppliers, partners and transactions.
- Maintain traceable payments and reliable records.

2. Scope

- Clients, suppliers, subcontractors, partners, consultants and intermediaries.
- Training, services, equipment supply, consulting, IT, HSE and industrial operations.
- All payments, contracts, invoices and commercial transactions.

3. Risk-based approach

- Identify higher-risk countries, sectors, counterparties and transaction patterns.
- Apply enhanced checks where risks are elevated.
- Refuse or suspend relationships where risks cannot be managed.

4. Customer and partner due diligence

- Identify the client, supplier or partner and understand the nature of the relationship.
- Request supporting documents when required by the risk level.
- Verify consistency between the transaction, the contract and the economic purpose.

5. Payment traceability

- Use bank channels and documented payment methods.
- Avoid unexplained cash payments, payments through unrelated third parties or split payments without justification.
- Maintain invoices, contracts, payment evidence and correspondence.

6. Suspicious transactions

- Refuse suspicious or unjustified transactions.
- Escalate anomalies to Executive Management and the relevant compliance contact.
- Cooperate with competent authorities where required by law.

7. Record keeping

- Keep contracts, invoices, identity documents and payment evidence for the applicable retention period.
- Protect records from unauthorized modification or destruction.

8. Training and monitoring

- Raise awareness among staff involved in sales, finance, procurement and project management.
- Review transactions and update controls based on risks and incidents.

Approval

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Position	Managing Director
Organization	EBI