SUCON

Multidisciplinary Consultancy Services

ANTI-MONEY LAUNDERING POLICY

Published & Effective: 21/03/2025

SUCON INTERNATIONAL

Multidisciplinary Consultancy Services

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1. APPLICATION

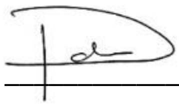
This policy applies to all paid, contracted and volunteering staff of the SUCON International (from here on referred to as 'SUCON'. This policy also applies to all SUCON associates, subcontractors and freelancers. This policy also extends to all business extensions of SUCON.

2 EFFECTIVE DATE: 21/03/2025

The Anti-money Laundering Policy applies to all SUCON relevant operations fromthe effective date stipulated above. From the date stipulated above all previous Associates and Expertise Policy and practices are repealed.

3 POLICY IMPLEMENTATION, APPROVAL, MONITOR AND REVIEW

The Central Administration and the responsible officer(s) of SUCON via the authority of the President, Vice President(s) and Operations Manager are liable for the management and implementation of this Policy and ensuring that its provisions and records management are applied and adhered to. This includes the establishment of relevant record-keeping systems.

APPROVAL AND REVIEW	DETAILS
Policy Author	Flyriver Niupulusu, Operations Manager
Council Approval	 Lefaotogi Paletasala Faolotoi President
Next Review Date	March 2028

4 PURPOSE AND DEFINITION

SUCON International is committed to conducting business ethically and in compliance with all applicable anti-money laundering (AML) laws and regulations. To protect our reputation, clients and staff, it is vital to minimize the risks of our business being exploited to facilitate money laundering and financing crimes. Hence, this policy was developed to outline our Company's procedures to detect, prevent, and report money laundering, and other financial crimes including terrorist financing and proliferation financing. This policy is designed to ensure that our Company does not knowingly or unknowingly engage in or facilitate money laundering, terrorist financing, or proliferation financing activities.

4.1 Objective

This policy on the prevention of money laundering applies to all countries where the Company operates and to all business activities within those countries. It is clear statement to our staff and regulators regarding the SUCON's position on this critical issue.

5 LEGISLATIVE FRAMEWORK

This policy observes guidelines offered by the relevant national and international AML laws, including but not limited to:

i. The Financial Action Task Force (FATF) Recommendations
ii. The Samoa AML/CTF National Policy
iii. Money Laundering Prevention Act (MLPA) 2007
iv. Money Laundering Prevention Regulations 2009
v. Money Laundering Prevention Guidelines 2010
vi. The National Risk Assessment (NRA) 2014
vii. Counter Terrorism Act 2014
viii. Proceeds of Crime Act 2007
ix. Mutual Assistance in Criminal Matters Act 2007

For non-compliance with this policy conducted or found outside of the scope and location of Samoa, the equivalent legislation of the respective host nation shall be adopted if the suspect cannot be brought back to the headquarters in Samoa.

6 DEFINITIONS

Below are the key terms and definitions to this policy:

6.1 Money Laundering

Money laundering is the process of disguising the origins of illegally obtained money by passing it through a legitimate business. Three stages of money laundering:

i. **Placement:** Introducing illicit funds into the financial system.
ii. **Layering:** Concealing the source through complex transactions.
iii. **Integration:** Making the funds appear legitimate.

6.2 Terrorist Financing

Terrorist financing involves providing funds or financial support to individuals or groups engaged in terrorist activities. Unlike money laundering, funds used for terrorist financing may come from both legitimate and illegitimate sources.

6.3 Proliferation Financing

Proliferation financing refers to providing financial support for the development, manufacturing, acquisition, or transport of weapons of mass destruction (WMDs). This includes circumventing international sanctions and export controls.

6.4 Financial Action Task Force (FATF) Recommendations

The FATF are the global AML/CTF/CPF standards and provide the most up-to-date insights into addressing money laundering, terrorist financing and proliferation financing around the world. Relevant authorities will, within resource constraints, apply the FATF recommendations, propose updates to laws as the recommendations evolve and, as much as possible, include the recommendations within normal workplace practices.

Non-compliance with the Policy may result in criminal or civil penalties which will vary according to the offence. An employee acting in contravention of the Policy will also face disciplinary action up to and including summary dismissal.

7 RISK ASSESSMENT AND CONTROL SYSTEM

SUCON decided to execute in writing this Policy to clarify our interpretations and "control systems" implemented to mitigate the risk of criminal offense occurrences, and in the event that a financial crime occurs, the policy intends to offer sufficient guidance to tackle the problem immediately and effectively.

7.1 Customer Due Diligence (CDD) – Customer Identification

To prevent financial crimes, SUCON International will conduct thorough due diligence on all clients and partners. This includes:

i) Identifying the client (verifying identity and ownership structure)
ii) Assessing the nature of the business relationship
iii) Screening clients against international sanction lists
iv) Enhanced due diligence for high-risk clients, including politically exposed persons and entities flagged for terrorism or proliferation concerns

7.2 Red Flags for Financial Crimes

Employees should be alert to potential indicators of financial crimes, including:

i) Unusual payment methods (e.g., cash, third-party payments, offshore accounts)
ii) Clients unwilling to provide clear information on funding sources
iii) Transactions inconsistent with the client's usual business activity
iv) Requests for refunds or overpayments that seem unusual
v) Business dealings with sanctioned individuals or entities
vi) Payments routed through high-risk jurisdictions

Refer to the relevant legislation and regulations of the host nation for further information on potential indicators of financial crimes.

7.3 Record Keeping

SUCON International will maintain accurate records of all transactions and client due diligence for a minimum of five (5) years, ensuring compliance with AML, counter-terrorist financing (CTF), and proliferation financing (PF) and other relevant international regulations and standards as approved by the President.

7.4 Training and Awareness

SUCON must raise awareness on money laundering prevention and train all employees to recognize and prevent financial crimes, including AML, CTF, and PF. Employees will also be trained on reporting suspicious activities without putting their selves at risk or jeopardizing an eventual investigation by the relevant authorities. Training will be updated annually or as required by regulatory changes. This must be conducted at least once on a bi-annual basis.

8 PROSECUTION AND RESTRAINTS OF PROCEEDS

The investigation and prosecution of money laundering and the restraint and confiscation of proceeds of crime are significant deterrent and disruption activities and are key indicators of effectiveness under the FATF evaluation processes. Relevant authorities will, as a matter of policy, pursue these twin objectives whenever considering action in relation to profit-motivated crime.

8.1 Reporting Suspicious Activities

If any employee identifies a suspicious transaction, they must report it immediately to the designated/local manager who shall report the issue to the Operations Manager, who shall carefully assess the situation and collect further information if/when possible to contact the relevant regulatory and law enforcement authorities if required. The Company will file a Suspicious Activity Report (SAR) where necessary and comply with all regulatory reporting requirements on terrorist financing and proliferation financing. SUCON International is committed to cooperation with any lawful request for information made by the host nation Government or law enforcement authorities during their investigations into money laundering.

8.2 Non-compliance

Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action or termination of employment or consulting arrangements without notice in alignment with the Misconduct Process and Procedures' in the Human Resources Policy. Violation of this Policy may also constitute a criminal offence under Samoan, American Samoa, Fijian, Solomon Island, Philippines and New Zealand laws depending on where the project is stationed. If it appears in the opinion of the President's Council that any director, officer, employee, consultant or contractor of Sucon may have violated such laws, then Sucon may refer the matter to the appropriate regulatory authorities, which could lead to civil or criminal penalties for Sucon and/or the responsible person.

8.3 Appeal Process

Verdicts that are believed to be unfair by the Administration can be challenged via writing to the Council. Verdicts believed to be unfair by the Council must be challenged in writing to the Legal Counsellor as stipulated in the 'Misconduct Process and Procedures'

8.4 Whistle Blower Protection and Retaliation Prevention

All SUCON staff, Council, and affiliate members are responsible for protecting the identity, security, and employment of the whistle-blower to prevent confrontation and retaliation from the alleged suspect and violator. Sucon staff, Council and affiliating members found to have leaked the identity of the whistle-blower are subject to suspension or termination by the Council or Administration depending on the level and severity of the case. Sucon staff, Council and affiliating members found to have participated directly or indirectly in retaliation are subject to suspension or termination by the Council or Administration depending on the level and severity of the case.

Whistle-blowers who are found to have falsified claims in an attempt for defamation are also subject to suspension or termination by the Council or Administration depending on the level and the severity of the case.

8. POLICY FEEDBACK

All SUCON employees and students may provide feedback about this document by emailing info@sucon.ws

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