



AML / CFT & Sanctions Policy

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Policy Owner	Jolie Norris, CLO
Approved By	John Sadler, CFO
Executive Committee Sign Off	26 th November 2024

AMENDMENT HISTORY

Version No.	Date	Background Information	Author
0.1	26-Nov-2024	Reviewed by CLO	Esther Palsgraaf, Compliance

PURPOSE

Bridge Carbon Limited ("Bridge Carbon") is committed to the fight against money laundering and terrorist financing and conducts all activities in accordance with all applicable laws and regulations.

The purpose of this Anti Money Laundering Counter Terrorist Financing and Sanctions policy is to ensure Bridge Carbon does not take part or is party to money laundering or terrorist financing.

In addition, Bridge Carbon recognises the importance of economic and trade sanctions ("Sanctions") and is committed to conducting all activities in accordance with applicable laws and regulations in the countries in which its projects operate.

SCOPE

This policy applies to all BC employees and third parties acting on BC's behalf across all BC entities. Where necessary, local policies and procedures may be defined in accordance with local requirements. This policy is intended to complement, not supersede existing or additional risk management activities across the business.

POLICY CATEGORIES

a. Policy Category 1 AML/CFT

We oppose the crimes of money laundering and terrorist financing and will not tolerate the use of Bridge Carbon operations for these purposes.

b. Policy Category 2 Reporting to regulator

We shall report any activity that we detect which is suspicious and may involve potential money laundering or terrorism financing to the applicable regulator.

c. Policy Category 3 Sanctions

We will not deal with countries, governments, entities, or individuals where legally prohibited by a country, group of countries, or international organizations.

d. Policy Category 4 Screening

We will screen all third parties we propose to contract with against relevant sanctions lists to prevent dealing with a sanctioned person or entity, and to assist in mitigating money laundering and terrorist financing risk.

RISK ASSESSMENT

A company-wide AML/CFT risk assessment must be conducted, documented, and updated on an annual basis.

SCREENING PROCEDURES

Before engaging a third party, we ensure that they have been screened and due diligence is conducted in line with the [Third-Party Risk Management Policy](#).

Sanctions screening of all third parties shall be undertaken before entering into any agreement, including sending quotes, NDAs, or any other transaction with any third party. Third parties are any counterparty to a transaction and include the following: customers, partners, suppliers, contractors, and any other relevant counterparty.

RED FLAG ESCALATION PROCEDURE

Sometimes you may identify a potential match when there is a partial name match or a name match but in a different country. These require investigation to determine whether they are a true match between the third party and the sanctioned individual or entity.

- Be alert to suspicious transactions, including cash transactions or transactions which do not make sense. Escalate when there is a concern.
- Escalate any suspicious interactions that could indicate money laundering or terrorism financing activities by third parties to prevent Bridge Carbon from being used as a conduit for such activities.
- Where either the third party is matched against a sanctions list, or the negative news search identifies potential red flags against the third party, this must be escalated via email to both the Legal and Finance team. A review of the relationship will be initiated to either address issues or end the relationship.
- The third party should not be notified that they have been matched against a sanctions list.

Anytime you have any concern that this Policy and related procedures are being breached, whether verified or unverified, escalate to your manager, the Bridge Carbon Legal Department, or report via [Bridge Carbon Voices](#). Even if you are not personally impacted by the concerning behaviour or situation, you must escalate.

RECORD KEEPING

All records pertaining to the Screening process are kept in the Avallone and ComplyAdvantage systems.

ROLES AND RESPONSIBILITIES

Role	Responsibility
Contracting Manager	<ul style="list-style-type: none"> • Responsible for initiating KYC and Due Diligence procedures
Compliance	<ul style="list-style-type: none"> • Review due diligence questionnaires. • Provide training to targeted personnel
Legal	<ul style="list-style-type: none"> • Ensure KYC and Due Diligence procedures are completed before execution of any agreements, including NDAs, with new partners, suppliers, employees, or contractors.

	<ul style="list-style-type: none"> Assess and respond to any escalated sanctions matches or potential matches
Finance	<ul style="list-style-type: none"> Assess and respond to any escalated red flags

VIOLATIONS

Violating this policy may result in remedial, corrective, or disciplinary actions up to and including termination of employment. Any suspected violations or breaches of this policy should be reported via [Bridge Carbon Voices](#).

DEFINITIONS

Money Laundering is a term used to describe the process of hiding the criminal origins of money or property which are the proceeds of crime within legitimate business activities. It also describes the use of money of a legitimate origin that supports terrorism. Money laundering could be a consequence of almost any profit-generating crime.

Terrorist Financing is the act of providing financial support to terrorism or terrorist organizations that enable them to carry out acts of terrorism.

Sanctions are punitive or coercive measures imposed by multinational bodies and governments to promote changes in the policy or activity of a targeted country, government, entity, or individual.

REFERENCES AND RELATED DOCUMENTS

References	
Related Documents	Third Party Risk Management Policy