

Anti-Financial Crime Policy

SGE are committed to the highest standards of anti-money laundering (AML), including anti-fraud, anti-corruption and taking measures to mitigate against financial crime. We understand that the money laundering regulations and legislation place a responsibility upon SGE employees to combat money laundering with regard to a wide area of financial transactions, including possessing, or in any way dealing with, or concealing, the proceeds of any crime.

SGE complies with the obligations and requirements set out by UK legislation, regulations and rules regarding AML. This includes ensuring that we have adequate systems and controls in place to mitigate against any risk posed to the firm and its clients. This policy is also in place to ensure that all employees know and understand their obligations with regards to our anti-money laundering measures and the consequences of non-compliance in this area. SGE will do everything possible to protect its staff and clients from being exposed to money laundering and will comply with the guidance and rules laid out in Money Laundering Regulations 2007, The Proceeds of Crime Act 2002 and the Terrorism Act 2000. Any actual or suspected acts of money laundering will be reported to the NCA and where applicable to regulatory requirements, an MLRO will be appointed to oversee all aspects of the anti-money laundering functions.

SGE operates a zero-tolerance policy with regards to bribery and corruption and also realise that impact that bribery and corruption have on the money laundering requirements. As bribery and corruption are often associated with organised crime and/or money laundering, we are committed to applying high standards of honesty and integrity throughout our organisation and ensure that all staff operate in accordance with the intent.

SGE adheres to and complies with the principles of the Know Your Customer policy which aims to prevent financial crime and money laundering through client identification and due diligence. All customers/clients who are new to the organisation will undergo procedural due diligence checks prior to opening an account, as laid out below:

There are certain measures and controls that can be implemented and carried out to help prevent against money laundering. SGE carries out such measures in the course of its daily business activities and is committed to preventing any aspect of financial crime.

- Client Identification Procedures – due diligence is performed on all new customers and where legal or regulatory standards require it.
- Traceable Transactions – all transactions carried out by are SGE recorded in such a manner that their original origin can be traced should the need arise.
- Records Management – all documents, accounts and transactions associated with clients/customers will be retained as per the legal or statutory retention periods, which currently stands at 'Close of Account +5 Years'.
- Reporting – Where required, an MLRO will be appointed and is responsible for monitoring all anti-money laundering measures and raising SAR's when needed. All documents relating to money laundering reporting, business transactions, client identification and customer due diligence are retained for a minimum of 5 years.

Signed:



William Silverstone (Managing Director)