



Stenson Tamaddon Anti-Money Laundering Policy

February 2, 2024

I. Introduction

1. Policy Statement. “Money laundering” is the illegal process of making money generated from criminal activity appear to have a legitimate source. StenTam is fully committed to complying with all anti-money laundering laws and will conduct business only with reputable customers and third parties involved in legitimate business activities and with funds derived from legitimate sources.

II. Policy

1. StenTam will never knowingly engage in or facilitate “money laundering” or other financial crimes and will take active steps to detect, deter, and minimize risks associated with these crimes, even when the involvement may be unintentional. In addition, StenTam does not tolerate tax evasion of any kind and will never knowingly facilitate tax evasion or related tax schemes. Therefore, StenTam will:

a. Ensure we know and verify our clients and business partners and their businesses and, when appropriate, conduct due diligence. The results of this due diligence will be retained consistent with StenTam’s Maintaining Accurate Business Records and Document Retention Policy.

b. Monitor financial activity and transactions.

c. Implement risk-based controls, including the prohibition of accepting payments from third-party payors (see II, 2 below) to avoid the risk of facilitating money laundering or tax evasion.

d. Maintain accurate and complete records of every business and financial transaction.

e. Report any suspicious activity or “red flags” to StenTam’s Legal Department, including the following:

(1) Clients and business partners who are reluctant to provide complete information and/or provide insufficient, false, or suspicious information;

(2) Clients and business partners who seek to avoid reporting or recordkeeping requirements;

(3) Clients and business partners who seek to conduct transactions in cash or cash equivalents (e.g., money orders or prepaid cash cards);

(4) Financial transactions unrelated to bona fide business transactions; and

- (5) Third-party transactions, including payments from unrelated third-party payors (see Paragraph II, 2 below).

- f. Fully cooperate with legal and regularity authorities charged with enforcing anti-money laundering laws.

2. Third-Party Transactions. StenTam will not accept any payment, funds, or monetary transfers from any “third-party payor.” For purposes of this policy, a “third-party payor” means any entity that does not have a contractual or a verifiable business relationship with StenTam.

III. Violation of this Policy

Violation of this policy may result in disciplinary action, up to and including termination of employment.

The StenTam Chief Legal Officer is the proponent of this policy. Any questions concerning this policy should be addressed to the Chief Legal Officer, or his designee.