

PZ STELMACH  
COMPANY: OPOLE



**S T E L M A C H**  
**Anti-Money Laundering  
and Terrorism Financing Policy**

Edition: 1  
Date: 08/11/2023

Edition	Approved by:	Allowed by:	Date:
1	Management Board President	Management Board President	08/11/2023



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### **POLICY STATEMENT**

This Policy confirms the obligation of **PZ Stelmach Sp. Ltd.** to prevent money laundering and terrorist financing in its business practices and transactions. Money laundering is the process of concealing the financial proceeds of crime in order to conceal their illicit origins. Terrorist financing is any type of financial support for those who attempt to encourage, plan or engage in terrorism.

**PZ STELMACH Sp. z o. o** is a legal and transparent company that accepts full responsibility for ensuring that assets and resources are not used for corruption, irregularities or money laundering. **PZ Stelmach Sp. z o. o.** is committed to detecting fraud, irregularities, abuse of position and any institutional benefits.

The Commercial Director is responsible for the Anti-Money Laundering and Terrorism Financing Policy.

### **SCOPE**

The Policy applies to all entities related to **PZ Stelmach Sp. z o. o.** including its employees, directors, officers, contractors and third parties acting on behalf of the company. It is a document intended for internal use, and the company's Management Board is responsible for providing any interested person or entity with it. Failure to comply with the principles contained in the Policy will result in the appropriate actions.



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**PZ Stelmach Sp. z o.o.** has established procedures (KYC) to combat money laundering and terrorist financing. These procedures allow you to identify each organization, understand the legality of business relationships, and identify and respond to unusual or suspicious activities.

To support the KYC Policy and Procedures, the company has developed a KYC form that is sent to all contractors (business partners: suppliers and customers) in order to collect relevant business information to identify the risk of money laundering. The form must be completed for all existing and new contractors

By checking the information contained in the completed KYC forms, **PZ Stelmach Sp. z o. o.** undertakes to:

- establish the identity of contractors,
- check that contractors are not considered high-risk entities (this means checking that contractors are based in FATF high-risk jurisdictions, listed on government-sponsored watch lists or international (UN) sanctions lists, or are from conflict-affected areas and high risk areas (CAHRA)),
- maintain an understanding of the nature and legality of all contractors activities,
- keep KYC documentation for at least five years,
- keep records of all individual or related cash (or cash-like) transactions over EUR 10,000,
- monitor transactions for unusual or suspicious activities.

If contractors are considered high-risk for any reason (for example, they are on a sanctions list or engage in an unusual activity), **PZ Stelmach Sp. z o. o.** can:

- stop trading with the contractor,
- identify the beneficial owners of the contractor and check whether they are on watch lists or sanction lists,
- conduct an on-site visit to a high-risk contractor.

By implementing this customer identity verification and financing source check procedure company can maintain high standards of security, integrity and compliance in its operations.

### **RESPONSIBILITY**

The Management Board President is responsible for the development and implementation of this Policy

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and the appropriate procedures, and **PZ Stelmach Sp. z o. o.** undertakes to review the KYC Policy and procedure annually.

A handwritten signature in blue ink that reads "Stelmach Wojcik".

(Responsible Person Signature)