

MASTER COMPLIANCE POLICY

S&P Vertex Trade Ltd.

1. Purpose

This Compliance Policy sets out S&P Vertex Trade Ltd.'s commitment to conducting all business activities ethically, transparently, and in strict compliance with applicable laws and regulations, including EU and international standards.

2. Scope

This policy applies to:

- All employees, contractors, and representatives of S&P Vertex Trade Ltd.
 - All transactions, whether within the EU or internationally.
 - All third parties engaged in business with S&P Vertex Trade Ltd., including suppliers, agents, and buyers.
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3. Anti-Corruption & Bribery

- S&P Vertex Trade Ltd. **prohibits** any form of bribery, facilitation payments, or improper advantage.
 - No employee or representative may offer, give, solicit, or accept anything of value to improperly influence business decisions.
 - All gifts or hospitality must be reasonable, infrequent, and transparently recorded.
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4. Sanctions Compliance

- The company will **not engage** in business with any person, entity, or country listed on applicable sanctions lists, including:
 - EU Sanctions List
 - UN Security Council Sanctions List
 - OFAC (U.S.) Specially Designated Nationals (SDN) List
- Sanctions screening is performed for **all counterparties** before any transaction.

5. AML/KYC (Anti-Money Laundering & Know Your Customer)

- All new suppliers and buyers must undergo **identity verification** and beneficial ownership checks (UBO).
- Required documentation includes:
 - Company registration certificate
 - Proof of address
 - Identification for directors and UBOs (>25% ownership)
- All payments must be made through traceable banking channels — cash transactions are prohibited.

6. Record-Keeping

- Transaction records, contracts, and compliance documents must be kept for **at least 5 years**.
- All due diligence files must be stored securely and be available for inspection by relevant authorities.

7. Reporting Concerns

- Any employee or partner may report suspected breaches of this policy via compliance@spvertextrade.com
- Reports will be investigated confidentially, and no retaliation will be tolerated.

8. Enforcement & Consequences

- Breaches of this policy may result in disciplinary action, termination of contracts, and legal proceedings.
- Where applicable, breaches will be reported to regulatory authorities.

Approved by:

Stanislav Panayotov, Director
S&P Vertex Trade Ltd.
19.08.2025