



**KARPEN
PARTNERS**
Strategic Introductions

ANTI-MONEY LAUNDERING, SANCTIONS AND COUNTERPARTY SCREENING (SUMMARY)

Last updated: April 6th, 2026

1. Commitment

1.1. Karpén Partners Pte. Ltd. (“Karpén Partners”) is committed to maintaining high standards of integrity and to mitigating risks related to money laundering, terrorism financing, sanctions breaches, and other illicit activities.

2. Scope of Application

2.1. While Karpén Partners is not a regulated financial institution, we apply internal principles and risk-based measures to assess the counterparties and opportunities with which we engage.

3. Counterparty Screening

3.1. Karpén Partners may perform screening and assessment of counterparties, which may include:

- sanctions and watchlist checks
- basic identity and background verification
- reputational and adverse media review
- assessment of business activities and jurisdictions

3.2. Such screening is conducted on a risk-based and proportionate basis.

3.3. Jurisdiction risk is assessed with reference to the Financial Action Task Force (FATF) classifications. Counterparties with connections to FATF Black List jurisdictions (currently: North Korea, Iran, Myanmar) are subject to mandatory refusal. Counterparties with connections to FATF Monitored Jurisdictions are subject to enhanced due diligence. FATF lists are reviewed three times per year and Karpén Partners’ assessments are updated accordingly.

4. Sanctions Compliance

4.1. Karpén Partners does not knowingly engage with individuals or entities that are subject to applicable sanctions regimes.

4.2. This includes, where relevant, sanctions imposed by Singapore and internationally recognized authorities.



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5. Risk-Based Approach

5.1. We apply a risk-based approach to engagements, taking into account factors such as:

- jurisdiction
- nature of the business
- transaction context
- counterparty profile

5.2. Where risks cannot be adequately mitigated, Karpén Partners may decline or discontinue involvement.

6. No Guarantee of Compliance by Third Parties

6.1. Karpén Partners does not act as a compliance or verification agent for any party.

6.2. All counterparties remain responsible for conducting their own due diligence and ensuring compliance with applicable laws and regulations.

7. Escalation and Refusal Rights

7.1. Karpén Partners reserves the right to:

- refuse introductions or engagements
- suspend ongoing involvement
- escalate concerns internally

where potential financial crime, sanctions, or reputational risks are identified.

8. Confidentiality

8.1. Any screening or assessment conducted is handled in accordance with applicable confidentiality and data protection principles.

9. Contact

9.1. For any questions relating to this statement, please contact:

Compliance - Karpén Partners Pte. Ltd.
Email: compliance@karpenpartners.com