



Anti-money laundering and combatting the financing of terrorism policy and guidelines on export control and financial sanctions

This document has been drawn up by the Company in order to set out its practical policy as regards the implementation of the market-based approach to anti-money laundering/combating the financing of terrorism ("AML/CFT") and the AML/CFT control measures, and to set out the requirements under all applicable EU and US laws and regulations on export control and financial sanctions.

The objective of this Policy is:

- to establish an effective system of internal rules, procedures and control measures at the Company in order to prevent the Company from being involved in Money Laundering or Terrorism Financing, and in order to prevent the clients and contractors of the Company from Money Laundering and Terrorism Financing;
- to specify the duties of the Company and its Employees regarding the implementation of, and compliance with, the Company's obligation to combat Money Laundering and Terrorism Financing;
- to provide Employees with information and guidelines on how to recognise cases of Money Laundering and Terrorism Financing and how to proceed in such cases, and on methods of combatting them; and
- to set out the requirements under all applicable EU and US laws and regulations on export control and financial sanctions; to specify the obligations and to provide information and guidelines as to how to proceed in that respect.

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Full version of the policy is an internal information, not publicly disclosed.