

AML & CTF POLICY

VERSION: 1

DATE OF APPROVAL: 2022-06-03

APPROVER: BOARD OF DIRECTORS

POLICY OWNER: HEAD OF LEGAL

1 BACKGROUND AND PURPOSE

Vestum AB (publ), reg. no 556578-2496 (“**Vestum**”) has developed governing documents, including this policy, and processes to ensure that Vestum is complying with applicable laws and regulations and that Vestum’s values and desired ways of conducting business are communicated and followed throughout the entire organization.

The object of this policy is to secure compliance with anti-money laundering (“**AML**”) and counter-terrorist financing (“**CTF**”) regulations.

2 AUDIENCE

This policy applies to Vestum, and all legal entities controlled by Vestum (“**Vestum Group**”). Accordingly, the policy applies to all employees and temporary staff within Vestum Group and it is everyone’s responsibility to adhere to, and act according to, the principles set out in the policy.

3 VESTUM’S COMMITMENT TO COMPLY WITH AML AND CTF REGULATIONS

Vestum Group is committed to fully comply with AML and CTF regulations. Accordingly, employees within Vestum Group are required to adhere to applicable AML and CTF regulations in all jurisdictions in which Vestum Group operates.

4 THE USE OF AML AND CTF REGULATIONS IN THE INTERNATIONAL COMMUNITY

AML and CTF activities are threats to the integrity and the stability of the international financial system. Vestum Group, as well as other companies, has a responsibility to its customers, shareholders, and regulators to prevent Vestum Group from being used to facilitate the movement of criminal proceeds or transfer of funds destined to finance terrorism.

Vestum Group is committed to identifying and managing the AML and CTF risks to which it is exposed and to take proportionate measures required to manage these risks across all jurisdictions in which it operates.

5 VESTUM SHALL NEVER VIOLATE AML AND CTF REGULATIONS

Vestum Group and its employees are prohibited from engaging in transactions, and facilitating (i.e. assisting, supporting or approving) activities by third parties, that may violate AML and CTF regulations.

In addition to the above, Vestum Group shall never engage in any transaction involving a counterparty refusing to provide its location, state of organization or the state of origin.

All employees must be aware of potential issues regarding AML and CTF regulations. When needed, party screening should be conducted for counterparties (i.e. distributors, vendors, customers, shipping companies, freight forwarders, agents, banks etc.).
