

**COMPLIANCE**

**ANTI-MONEY LAUNDERING  
(AML) AND  
COUNTER-TERRORIST  
FINANCING (CTF)  
POLICY**



# ANTI-MONEY LAUNDERING (AML) AND COUNTER-TERRORIST FINANCING (CTF) POLICY

## 1. PURPOSE AND SCOPE

The purpose of this Policy is to provide guidance for preventing and actively monitoring money laundering, terrorist financing, and financial crimes that Egebant, its affiliates ("Company"), and all third parties may encounter in the course of their commercial activities. Accordingly, all Company operations shall be carried out in line with the core components of a program that includes identification and verification of customers and third parties, monitoring of customer activities, reporting and investigation of unusual and suspicious activities, training of employees on prevention and detection of money laundering, and appointment of responsible officers for reporting money laundering offenses.

This Policy has been prepared in accordance with the Code of Business Ethics and Related Policies, and all applicable local laws and regulations (e.g., Terrorist Financing Law, POCA – Proceeds of Crime Act, Anti-Money Laundering Law). This Policy applies to all Egebant employees. Failure to comply with this Policy may result in severe criminal, legal, and regulatory penalties for Egebant and its employees.

## 2. DEFINITIONS

**Money Laundering** refers to the concealment or disguise of financial assets obtained through illegal means. This process involves attempts to legitimize assets derived from criminal activities and to hide their true origin, typically through placement, layering, and integration. Money laundering may occur through knowingly conducting transactions involving proceeds of crime or by ignoring warning signs of unusual or suspicious activities related to a customer or transaction.

**Terrorist Financing** refers to activities that provide financial support to declared or undeclared terrorists, individuals, groups, organizations, or supporters of terrorism. Terrorism may be financed through illegal activities such as credit card fraud, arms trafficking, and drug trade, as well as through legally obtained funds. In both cases, the objective is to conceal the source of funds and their final use. As with money laundering, any appearance of direct or indirect association with terrorism may expose Egebant to unacceptable levels of sanctions and reputational risk.

**Politically Exposed Persons (PEPs)** are individuals entrusted with prominent public functions by a country, whether domestic or foreign. Examples include heads of state or government, senior politicians, senior government, judicial or military officials, senior executives of state-owned enterprises, and important political party officials.

**High-Risk Countries** are countries that have not made sufficient progress in addressing strategic deficiencies in combating money laundering and terrorist financing or have not committed to an action plan in accordance with the Financial Action Task Force (FATF).

**High-Risk Customers** are individuals or legal entities that have business relationships with High-Risk Countries.

**Facilitation Payments** refer to payments made to carry out "routine governmental actions" where no discretion is involved. Examples include processing visas, providing police protection and postal services, and supplying infrastructure services such as telephone, electricity, and water. Routine governmental actions do not include decisions to award new business or continue business with a particular party, or actions that involve abuse of official authority. For example, paying a small amount to a public official to restore electricity to a factory may be considered a facilitation payment.

### 3. SUSPICIOUS TRANSACTIONS

Egebant employees must always remain alert to signs of money laundering and report suspicious transactions to regional compliance officers.

The following situations may be considered examples of suspicious transactions:

- Suppliers, customers, or third parties that fail to provide complete information, provide incorrect or suspicious information, or show concern about complying with reporting and record-keeping requirements,
- Customers who agree to pay above market prices,
- Customers or suppliers who insist on payments in cash or cash equivalents,
- Transactions involving countries identified as high risk by FATF,
- Abnormal cash transfers inconsistent with the nature of the transaction,
- Multiple money orders, traveler's checks, or large amounts of cash,
- Payments made in currencies not specified in contracts,
- Payments made to or requested by third parties not named in relevant contracts,
- Unusual transactions with individuals and/or entities whose source of funds is unknown,
- Payments to "shell bank" accounts or to persons or entities residing in so-called "tax haven" countries, or unusual fund transfers to/from foreign countries unrelated to the transaction,
- Payments to or from entities whose ownership structure or ultimate beneficial owners cannot be identified.

### 4. KNOW YOUR CUSTOMER (KYC) PRINCIPLE

Egebant employees must exercise due care in knowing their customers and conducting due diligence in order to avoid willful blindness to money laundering or other suspicious activities.

Accordingly, Egebant and its employees shall adhere to the following principles:

- Obtain sufficient information about the business environment and the purpose of business sought by third parties,
- Assess money laundering risks related to third parties by monitoring their activities,
- Evaluate the integrity of potential customers and other business relationships,
- Screen shareholders, responsible managers, and key executives against watch lists and conduct reputation checks,
- Conduct media searches in English and local languages regarding shareholders, responsible managers, and key executives,
- Perform ongoing monitoring of customers, suppliers, and distributors based on their risk profiles,
- Always communicate Egebant's compliance expectations and sensitivity on these matters to all stakeholders.

### 5. DUTIES AND RESPONSIBILITIES

This Anti-Money Laundering Policy is also monitored by Egebant's Finance Department, and corrective and/or preventive actions are taken against non-compliant behavior by relevant parties. All employees must comply with this Policy, and violations may result in various sanctions, including termination of employment as a last resort.

Compliance Officers are company employees appointed by the General Manager and are responsible for monitoring the Company's activities related to this Policy.