

Alantra Capital Markets

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ANTI-MONEY LAUNDERING (AML) POLICY

1. GENERAL PRINCIPLES

1.1. Alantra Capital Markets (hereinafter - the "Company") is committed to high standards of compliance with anti-money laundering (AML) and counter-terrorist financing requirements.

1.2. The Company applies a "Know Your Customer" (KYC) policy to all clients without exception.

1.3. This policy is developed in accordance with international FATF standards and industry best practices.

2. CLIENT IDENTIFICATION PROCEDURES

2.1. Basic Identification:

- Identity document verification (passport)
- Contact information confirmation
- Client questionnaire completion

2.2. Enhanced Due Diligence (for amounts over 250,000 USD):

- Additional verification of sources of income
- International sanctions list checks
- Business relationship analysis

3. TRANSACTION MONITORING

3.1. The Company conducts ongoing monitoring of all client operations to identify suspicious transactions.

3.2. Criteria for suspicious operations:

- Operations inconsistent with client profile

- Frequent cash operations
- Operations with high-risk jurisdictions
- Unusual funds movement patterns

4. REPORTING

4.1. Upon detection of suspicious operations, the Company sends appropriate notifications to competent authorities.

4.2. The Company maintains records of all transactions and client documents for a minimum of 5 years.

5. STAFF TRAINING

5.1. All Company employees undergo mandatory training on AML/KYC issues.

5.2. Regular training sessions are conducted to update knowledge in the field of anti-money laundering.