Document:	Policy
Document owner:	General Counsel
Approved by:	Board of Directors
Date of approval:	2025-02-18
Version:	3
Applicable from:	Date of approval

AML & CTF POLICY

1. BACKGROUND AND PURPOSE

Cynca Nordic AB (publ), reg. no 556578-2496 ("**Cynca**") has developed governing documents, including this policy, and processes to ensure that Cynca is complying with applicable laws and regulations and that Cynca'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 Cynca, and all legal entities controlled by Cynca ("**Cynca Group**"). Accordingly, the policy applies to all employees and temporary staff within Cynca Group and it is everyone's responsibility to adhere to, and act according to, the principles set out in the policy.

3. CYNCA'S COMMITMENT TO COMPLY WITH AML AND CTF REGULATIONS

Cynca Group is committed to fully comply with AML and CTF regulations. Accordingly, employees within Cynca Group are required to adhere to applicable AML and CTF regulations in all jurisdictions in which Cynca 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. Cynca Group, as well as other companies, has a responsibility to its customers, shareholders, and regulators to prevent Cynca Group from being used to facilitate the movement of criminal proceeds or transfer of funds destined to finance terrorism.

Cynca 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. CYNCA SHALL NEVER VIOLATE AML AND CTF REGULATIONS

Cynca 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, Cynca 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.).

____