

## **Anti-Money Laundering Policy**

### **Introduction**

We are committed to conducting our business in an honest and ethical manner and complying with applicable laws and regulations, as set out in our Code of Conduct.

Anyone involved in money laundering is at risk of committing a criminal offence. Individuals found guilty of such offences can be imprisoned and/or fined. Eternali could also face severe consequences – including an unlimited fine and debarment from public contracts – if it commits a corporate offence.

We take a zero-tolerance approach to money laundering. We consider our money laundering risk to be low due to the jurisdictions and sector in which we operate, but we are committed to implementing and enforcing effective measures to address any risks that may arise. This policy is one such measure. It supports our Code of Conduct by setting out requirements and responsibilities relating to money laundering. This policy will be reviewed at least annually by the CFO and may be updated or changed accordingly.

### **What is money laundering?**

Money laundering is the practice of concealing or disguising the origins of proceeds derived from criminal activity by creating the appearance that the proceeds are derived from a legitimate source. The underlying criminal activity can include obvious crimes such as drug trafficking, fraud, bribery or organized crime. In some jurisdictions, it can also include tax evasion, export control offences or regulatory crimes.

If successful, money laundering sustains a variety of criminal or terrorist activities by allowing criminals to maintain control over and use of their illicit funds, oftentimes to finance additional criminal activity, and to prevent their illegal activities from being detected. Various jurisdictions have enacted anti-money laundering (“AML”) laws directed at preventing the use of the financial system for money laundering, terrorist financing, and other financial crimes.

The broad scope of the laws and legislation and regulations in place regarding money laundering and terrorist financing means that lawfully operating companies may interact with third parties seeking to launder the proceeds of criminal activity. For example, criminals may seek to involve Eternali at any stage in the process, for example by using illegal funds to purchase goods and services.

All individuals subject to this policy should look out for potential “red flags” regarding money laundering. A “red flag” is a fact pattern, situation, request, or other circumstance that indicates a possible money laundering or terrorist financing risk. In some circumstances, further inquiries may confirm why there was a potential red flag. In these circumstances, the situation should be documented, and the information provided to the CFO. In case of doubt whether a certain fact or information known constitutes a “red flag,” please inquire with the CFO.

### **Who must comply with this policy?**

The manual applies to all Eternali directors, officers and employees worldwide as well as stakeholders, consultants, vendors, contractors and/or any other supplier of Eternali.

### **Who is responsible for this policy?**

The CFO is the owner of this document, oversees the other policies and other operational guidelines are aligned with this document and shall propose any necessary changes to them. Any material changes to this policy shall be approved by the Board. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

**Risk and risk mitigation measures**

All payments to and from third parties should be reviewed to ensure that the correct amounts have been transmitted from or to the correct entity or individual and the correct bank account. Any concerns should be raised with the CFO.

**Invoices and financial record-keeping**

We must keep accurate financial records and have appropriate internal controls in place to ensure that there is a clear reason and supporting evidence for all payments. All payments received and made on our behalf must be supported by appropriate documentation. In particular, accounts, invoices and other records relating to suppliers' work must be accurate and complete. Accounts must not be kept 'off-book' to enable or conceal improper payments.

**Raising concerns**

If you suspect or become aware that someone – inside or outside Eternali – may be engaged in money laundering in connection with the company's business, you must immediately report it to your immediate manager or the CEO.

**No Retaliation**

Individuals who refuse to take part in money laundering, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in money laundering, or because of raising or reporting genuine concerns in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, bullying, harassment, and other unfavorable treatment.

**Breaches of this Policy**

Any officer or employee who breaches this policy, the Code of Conduct or applicable laws, will be subject to appropriate disciplinary action, up to and including dismissal.

Any supplier that is found or suspected to have breached this policy, the Suppliers Code of Conduct or applicable laws, or to have otherwise failed to act with the level of integrity we expect, will be subject to appropriate remedial action, which may include termination of the engagement. If serious illegality is suspected or identified, law enforcement authorities will be informed.