

## ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY

### I. GENERAL PROVISIONS

#### 1. PURPOSE

This Anti-Money Laundering and Counter-Terrorist Financing Policy (hereinafter: the “Policy”) aims to: ensure compliance with the applicable legislation of the Republic of Bulgaria, including the AML Act and its Implementing Rules; introduce effective internal rules and control mechanisms for identifying, assessing, and mitigating the risks of money laundering and terrorist financing; provide training and raise awareness among employees and management with respect to their obligations.

#### 2. SCOPE

This Policy applies to the entire business activity of TIBIEL EOOD, including:

- all employees, regardless of position or location;
- all clients and counterparties;
- third parties, intermediaries, and business partners.

### II. LEGAL FRAMEWORK

- Anti-Money Laundering Act (AMLA);
- Counter-Terrorist Financing Measures Act (CTFMA);
- Secondary legislation and guidelines issued by the State Agency for National Security (SANS);
- International standards (FATF, EU AML Directives).

### III. DEFINITIONS

Money laundering – the process of concealing the illicit origin of acquired funds;

Terrorist financing – the provision or collection of funds for the purpose of committing terrorist acts;

Ultimate Beneficial Owner (UBO) – the natural person who ultimately owns or controls the client;

PEPs (Politically Exposed Persons) – natural persons entrusted with prominent public functions.

### IV. CUSTOMER DUE DILIGENCE (CDD)

#### 1. STANDARD DUE DILIGENCE

- Identification of the client and verification of their identity;
- Identification and verification of the ultimate beneficial owner;
- Collection of information regarding the purpose and nature of the business relationship.

#### 2. Enhanced Due Diligence (EDD)

- Applied when higher risk is identified (e.g. client from a high-risk jurisdiction, PEP);
- Requesting additional documents and evidence of the origin of funds;
- Conducting enhanced ongoing monitoring.

#### 3. Simplified Due Diligence (SDD)

Permissible only in cases allowed by law and subject to prior risk assessment.

### V. RISK ASSESSMENT AND MANAGEMEN

- Performing regular internal risk assessments by sector, product, client, and country;
- Developing internal procedures for risk categorisation;
- Applying risk-based measures.

### VI. MONITORING AND REPORTING OF SUSPICIOUS TRANSACTIONS

- Monitoring of client operations and transactions for irregularities and suspicious patterns of behaviour;
- Preparing and submitting a report upon identifying a suspicion of money laundering or terrorist financing;
- Maintaining a log of suspicious transactions and actions taken.

### VII. RECORD KEEPING

Retaining customer due diligence records and related documentation for a minimum period of five (5) years after termination of the business relationship.

### VIII. TRAINING AND COMPETENCE DEVELOPMENT

- Conducting initial and periodic training for employees
- Providing access to up-to-date regulatory requirements and best practices;
- Testing and certification of knowledge.

### IX. BREACHES AND SANCTIONS

Breaches of this Policy are considered a serious disciplinary offence and may result in

- warning;
- termination of employment;
- referral to the competent authorities.

Approved by the Manager of TIBIEL EOOD