



Anti-Money Laundering, Counter-Terrorist Financing, and Fraud Policy Statement

ASTERN ENERGY GmbH is dedicated to upholding the highest standards of integrity and compliance with all relevant laws and regulations, including Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), and fraud prevention measures. As part of this commitment, we have established comprehensive policies and procedures to safeguard against illicit activities in our business operations and relationships.

1. Compliance Framework

ASTERN ENERGY GmbH has implemented a robust compliance framework aimed at detecting, preventing, and deterring money laundering, terrorist financing, and fraud activities. This framework undergoes regular review and updates to ensure alignment with evolving regulatory requirements and industry best practices.

2. Risk Assessment

Regular risk assessments are conducted to identify and evaluate potential money laundering, terrorist financing, and fraud risks associated with our business activities, products, services, and customer relationships. These assessments inform the development and implementation of risk-based controls and measures to effectively mitigate identified risks.

3. Customer Due Diligence (CDD)

We employ a risk-based approach to customer due diligence, requiring the collection of adequate information to establish and verify the identity of customers, beneficial owners, and related parties. Enhanced due diligence measures are applied to higher-risk customers, transactions, and business relationships.

4. Transaction Monitoring

Transaction monitoring procedures are in place to detect and investigate suspicious activities, including unusual transaction patterns, large or complex transactions, and transactions involving high-risk jurisdictions or counterparties. Any suspicious transactions identified are promptly reported to the relevant authorities as required by law.



5. Employee Training and Awareness

All employees receive regular training on AML, CTF, and fraud prevention policies, procedures, and obligations relevant to their roles. This training ensures that employees understand their legal obligations and are equipped to identify and report suspicious activities effectively.

6. Reporting and Compliance Oversight

ASTERN ENERGY GmbH maintains robust reporting mechanisms and channels for employees to report any suspected instances of money laundering, terrorist financing, or fraud. Thorough investigations of reported concerns are conducted by our compliance team, ensuring timely reporting to the appropriate regulatory authorities.

7. Compliance Monitoring and Review

Regular reviews and audits of our AML, CTF, and fraud prevention program are conducted to assess effectiveness, identify areas for improvement, and address emerging risks and challenges. Any necessary enhancements or updates to policies, procedures, and controls are promptly implemented to maintain regulatory compliance and mitigate risks effectively.

8. Collaboration and Cooperation

ASTERN ENERGY GmbH is committed to collaborating and cooperating with regulatory authorities, law enforcement agencies, and other stakeholders in combating financial crime. Active participation in information sharing initiatives and support for global efforts to combat financial crime are integral to our commitment.

9. Conclusion

ASTERN ENERGY GmbH is dedicated to maintaining a robust AML, CTF, and fraud prevention program to safeguard the integrity of our operations, protect our customers and stakeholders, and contribute to global efforts to combat financial crime. Through adherence to the principles outlined in this policy, we demonstrate our commitment to ethical business conduct and regulatory compliance.

Ivan Khodov

30 April 2024

A handwritten signature in blue ink, appearing to read "Ivan Khodov", is written over a light blue circular stamp.

General Director
ASTERN ENERGY GmbH