

# Ad Astra Group's Anti-Money Laundering and Counter Terrorist Financing Policy

**RESPECT and APPRECIATION for all high values.  
Preventing cases of bribery and corruption in our business.**

This policy, referred to as the Anti-Money Laundering and Counter Terrorist Financing (AML and CTF) Policy, sets out the Ad Astra Group commitment to complying with local and international regulations with regards to the prevention of money laundering, terrorist financing and financial crime. This includes the implementation and maintenance of adequate controls in order to mitigate and manage AML, CTF and other financial crime related risks.

To fulfil our responsibilities concerning AML and CTF, the Ad Astra Group has implemented the following measures:

- Maintaining a Compliance Department that is independent, has and develops the necessary expertise and is in close communication with all relevant departments, including the Ad Astra Group and its Board of Directors.
- Maintaining and updating a Risk Assessment to measure and manage AML and CTF risks in the Group.
- Maintaining and updating the AML and CTF Policy, Know Your Customer (KYC) principles, the Due Diligence on counterparties assessed as higher risk, including but not limited to State Owned Enterprises (SOE) and Politically Exposed Persons (PEPs).
- Maintaining and updating appropriate controls, tools and systems to monitor ongoing customer and vendor activity.
- Ensuring compliance with the relevant regulatory framework governing the prevention of money laundering and terrorist financing.
- Maintaining procedures for reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate.
- The maintenance of appropriate records for a minimum of 5 years; and
- Conducting regular trainings to employees and keeping relevant training records.

This policy applies to the entire Ad Astra Group and any of its subsidiaries.

**As the Ad Astra Group employee, you should:**

**KNOW** who you are dealing with and assist compliance with obtaining all required information.

**ESCALATE** instances of potential money laundering and terrorist financing attempts to the Compliance Department or via the Whistleblowing System.