



Anti-Money Laundering Policy

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Responsible for: CEO

Adopted by the Board of Storskogen Group AB, 6 November 2024



1. Introduction

This anti-money laundering policy sets out the overall guidelines for Storskogen Group AB (publ) and its subsidiaries ('**Storskogen**') to combat financial crime and prevent Storskogen's business being used for money laundering. There is always a risk of Storskogen, like all other businesses, being targeted by criminals trying to launder illicit funds or attempting to finance criminal activities. Therefore, it is important that we are vigilant about suspicious activity and that we conduct business in an ethical and socially responsible way and always in accordance with Storskogen's Code of Conduct.

1.1. Scope and availability

This policy covers all employees, board members, CEOs, consultants, temporary employees and other workers at Storskogen. The CEOs of each subsidiary must ensure that this policy is implemented at all operating subsidiaries and that it is available to all persons affected by the policy. Storskogen employees should read the policy annually or more frequently if necessary.

1.2. Breaches

If an employee becomes aware of a breach of this anti-money laundering policy, this should be reported. You will find more information on how to report under Section 5 Responsibility and reporting.

2. Target group and relation to laws, rules and other policies

This policy applies to the entire Storskogen group. Storskogen must, without exception, comply with applicable laws and rules in all countries in which Storskogen's companies conduct business. In some situations, such as in countries with weak legislation or controls, the requirements in this anti-money laundering policy may be more rigorous than local legislation and customs and conventions. In such cases we should always comply with this anti-money laundering policy and our own principles unless it is in direct contradiction with mandatory local law. The opposite applies to those cases where local legislation or regulations are stricter than this anti-money laundering policy. Likewise, subsidiaries are free to adopt its own anti-money laundering policy to apply stricter guidelines or more detailed regulations to prevent financial crime and money laundering if necessary. If other internal guidelines within a subsidiary conflict with this document, this policy takes precedence.

3. Roles and responsibilities

Below are the roles that should be in place at each company.

Role/job title	Responsibility
Board of Directors	Approval of anti-money laundering policy.
Policy owner	Ultimately responsible for this policy.
The CEO of each subsidiary	Responsibility for ensuring that the business fulfils the anti-money laundering policy and its implementation.



Employees	Responsible for complying with the policy and reporting incidents and breaches of the policy or legislation.
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4. Anti-Money Laundering Policy

4.1. Key concepts

Money laundering refers to actions relating to money or other property originating from crime or criminal activity that:

- may conceal the property's link with crime or criminal activity,
- may promote opportunities for someone to profit from such property or its value,
- may promote opportunities for someone to evade legal consequences, or
- means that someone acquires, has in their possession, makes a claim to or uses such property.

Terrorism financing entails supporting terrorism financially through direct contribution or by collecting, receiving, providing or supplying money and other assets to finance terrorism.

All employees are, in all respects, obliged to comply with the laws, regulations and requirements of government authorities and other organisations to prevent money laundering. This means that every employee is obliged to take measures to prevent any Storskogen company being part of activity that aims to take actions that constitutes money laundering.

4.2. Guidelines

Storskogen has not identified any of its companies as being subject to a reporting obligation under applicable legislation on measures against money laundering and terrorism financing. However, it is Storskogen's policy that some measure of caution should always be taken when initiating new business relationships or new types of transaction.

By following the guidelines below Storskogen reduces the risk of being part of activities that involve money laundering and terrorism financing:

- We always identify our counterparty by making sure that we have name, registration number/personal identification number and address.
- We conduct reviews of new customers, suppliers, subcontractors, business partners and sellers of companies in line with the procedures set out under Section 4.3.
- We are conscious of risk factors when we enter into a business relationship and are vigilant if we discover something that doesn't seem right in the various transactions undertaken.
- We have procedures for and are careful to save documentation regarding various decisions relating to financial transactions.
- If a customer, supplier, partner or other contact is reluctant to provide full details about themselves, any parent company, contact persons or other

significant information (such as who the payment is going to) or if there are uncertainties surrounding the payment (such as payment to an account belonging to a third party), or deviations, we should be suspicious and act according to the procedures for counterparties that means a warning flag in accordance with Section 5 of Storskogen's policy on sanctions and export control ("**Storskogen's Sanction Policy**").

- We do not handle cash, regardless of whether a customer, supplier, partner or other contact specifically requests payment in cash.
- We document measures and decisions in our review of suspicious transactions.
- We keep up to date about and comply with any financial sanctions that are currently in place for those countries in which we operate. Further information about the management of counterparties that are subject to sanctions is available in Storskogen's Sanction Policy.

4.3. Identification of a new counterparty

Prior to all new business relationships the counterparty must be identified to establish whether the counterparty should be regarded as a high-risk counterparty requiring greater caution. That entails that name, registration number (if it is a company) and address always should be noted for a counterparty. A high-risk counterparty is a party that lives or is established in another country than the following "Low Risk Countries":

- Australia
- Canada
- Japan
- the Member States of the European Economic Area (EEA) except for Cyprus and Malta
- New Zealand
- Switzerland
- the United Kingdom (UK)
- the U.S.

If the counterparty is a natural persons or legal entities domiciled or established in another country than any of the Low Risk Countries, the process to identify the counterparty in Storskogen's Sanction Policy shall be used.

The same applies if other indications and/or suspicious behaviour is displayed (e.g. reluctance by a counterparty to provide information about themselves, indications that a counterparty is acting on behalf of an unknown third party or a request for unusual payment terms), or if there is a reason to suspect that a certain supplier or customer is owned by a person in another country than a Low Risk Country.

Where a counterparty has been identified, using the procedure in Storskogen's Sanction Policy, as a prohibited counterparty, a business relationship may not be initiated with that counterparty.



4.4. Inform the person responsible for compliance with anti-corruption rules

If a red Risk Country (as identified in Storskogen's Sanction Policy) are involved or a match is identified when searching sanction lists in accordance with Storskogen's Sanction Policy, the person responsible for regulatory compliance must immediately be informed, and no action should be taken until the transaction is approved.

5. Responsibility and reporting

All employees are responsible for reporting circumstances that could conflict with this policy or that raise suspicions that Storskogen could be part of an activity aimed at committing financial crime through money laundering or terrorism financing to their line manager. Breaching applicable policies could lead to disciplinary consequences. It is ultimately CEO's at Storskogen's subsidiaries who are responsible for ensuring guidelines are communicated to employees and relevant external parties to promote wider knowledge and use of the policy.

If for any reason you do not feel comfortable talking with your manager, or if despite having reported the issue or made a complaint you feel it has not been taken seriously, you can always contact a member of Storskogen's group management or report your issue through Storskogen's external whistleblower function, which allows you to make an anonymous report: <https://report.whistleb.com/storskogen>.

6. Contact information

Each subsidiary's CEO is responsible for the general oversight and implementation of this policy in their business. If you have any questions or require further assistance, please e-mail to code@storskogen.com.

7. Exemptions

No exemptions from this policy are allowed. Any granting of exemption from this policy would require a documented decision from the Board of Storskogen Group AB (publ). Breaching this policy may result in disciplinary measures that could lead to personal consequences such as termination of employment, legal action or a requirement to pay damages.

8. Related documentation

- Storskogen's policy on sanctions and export control (Sanction Policy)
- Storskogen Code of Conduct

9. Version history

This policy should be reviewed annually and updated as required or when significant changes are made to sustainability-related work.

Version	Revision date	Description of changes	Author	Approved by	Date of approval
1.0	2020-05-15	Updated following comments from the Board	Louise St Cyr Ohm	Storskogen Board	2020-05-25



1.1	2021-05-12	Updated for international use and the new sanction policy	Louise St Cyr Ohm	Storskogen Board	2021-05-12
1.2	2022-10-20	Updated in line with Sanctions policy	Louise St Cyr Ohm	Storskogen Board	2022-11-14
1.3	2023-10-16	Clarification that Switzerland is a low risk country	Louise St Cyr Ohm	Storskogen Board	2023-11-06
1.4	2024-10-22	Update of low risk countries	Louise St Cyr Ohm	Storskogen Board	2024-11-06