

LETTER OF ENGAGEMENT
Chief Compliance Officer – Haris Constantinou

Date: August 27, 2025

INFUSION TECH B.V., incorporated under the laws of Curaçao, registration number: 120001, with registered office at 17, Chuchubiweg, Willemstad, Curacao, represented by its Managing Director, Capital Trust Corporation N.V. (the “**Company**”),
and

Mr. Constantinou, citizen of the Republic of Cyprus, passport Number K00257875 (issued on 18/01/2016, expires on 18/01/2026) and ID number 968733, born on 28 March 1992 (the “**CCO**”).

1. Appointment

The Company hereby engages Mr. Haris Constantinou as its Chief Compliance Officer (“**CCO**”) with effect from August 27, 2025, and the CCO accepts such engagement on the terms and conditions set forth herein.

2. Duties and Responsibilities

The CCO shall perform all duties customarily associated with the position of Chief Compliance Officer, including but not limited to:

- i. Monitor customer transactions and activity to detect suspicious or unusual behavior;
- ii. Identify and investigate red flags and risk indicators of money laundering or terrorist financing;
- iii. File Suspicious Activity Reports (SARs) or Suspicious Transaction Reports (STRs) to the relevant Financial Intelligence Unit (FIU);
- iv. Maintain accurate and confidential internal records of such reports and related correspondence.
- v. Maintain, review, and improve the Company’s internal AML/CTF/CPF policies and procedures;
- vi. Recommend updates as necessary to comply with evolving regulatory requirements or emerging risks;
- vii. Ensure consistency with applicable national and international frameworks.
- viii. Develop and deliver AML/CTF/CPF training for relevant Company personnel;
- ix. Conduct periodic refreshers and ensure all staff are aware of their roles and escalation duties.
- x. Supervise the Company’s CDD and Enhanced Due Diligence (EDD) processes;
- xi. Ensure appropriate risk profiling of customers, including identification of PEPs and high-risk accounts;

- xii. Review documentation on source of funds, beneficial ownership, and other required disclosures.
- xiii. Support audits, inspections, and formal requests for information.
- xiv. Conduct periodic reviews of the AML/CTF framework;
- xv. Recommend corrective measures for any deficiencies;
- xvi. Oversee implementation of approved changes and continuous improvement.

3. Term

This engagement shall continue until terminated by either party in accordance with applicable laws and the Company's internal governance procedures.

4. Remuneration and Benefits

Remuneration, benefits, and any other entitlements shall be as agreed separately in writing between the parties.

5. Confidentiality

The CCO shall maintain strict confidentiality with respect to all information, documents, and materials received in the course of performing duties under this engagement, both during and after the termination of this engagement.

6. Governing Law

This Letter of Engagement shall be governed by and construed in accordance with the laws of Curaçao.

7. Signatures

This document must be signed by both the Managing Director of the Company and the Chief Compliance Officer.

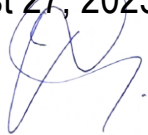
For and on behalf of INFUSION TECH B.V.

Name: Capital Trust Corporation N.V.

Title: Managing Director

Date: August 27, 2025

Signature:



Accepted and agreed by the Chief Compliance Officer

Name: Haris Constantinou

Date: August 27, 2025

Signature:

