

ANTI-MONEY LAUNDERING (AML) POLICY

SHAPEFY B.V.

Version 2.0

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1. INTRODUCTION

SHAPEFY B.V. recognizes the importance of preventing money laundering activities and is committed to complying with all applicable anti-money laundering laws and regulations.

This Anti-Money Laundering (AML) Policy outlines our commitment to implementing effective measures to detect and prevent money laundering activities in accordance with the requirements of the best international practices, standards and regulations.

This policy gives special attention to the recommendations issued by FATF/GAFI, to the provisions of the 4th European Directive on AML (EU Directive 2015/849), to EU Directive 2016/2258, to the 5th European Directive on AML (EU Directive 2018/843), to the 6th European Directive on AML (EU Directive 2018/1673) of the European Parliament and of the Council, to Regulations 2018/1672 and 2015/847/EC of the European Parliament and of the Council, to the EBA Guidelines on AML risk factors and due diligence measures (EBA/GL/2021/02). Moreover, the policy also acknowledges obligations under Proceeds of Crime (Money Laundering) and Terrorist Financing Act and related regulations.

2. POLICY STATEMENT

SHAPEFY B.V. is committed to:

- Implementing and maintaining effective AML procedures and controls.
- Conducting thorough due diligence on all clients, partners, and transactions.
- Training employees regularly on AML regulations and procedures.

- Reporting any suspicious activities to the relevant authorities.
- Cooperating fully with law enforcement agencies and regulatory bodies in the investigation and prosecution of money laundering activities.

3. RISK ASSESSMENT

SHAPEFY B.V. will conduct regular risk assessments to identify and evaluate potential money laundering risks associated with our products, services, clients, and geographical locations. The risk assessment will consider factors such as customer profiles, transaction volumes, and business relationships.

4. CUSTOMER DUE DILIGENCE (CDD)

SHAPEFY B.V. will perform thorough due diligence on all clients and partners before establishing a business relationship or conducting any transactions. This includes:

- Collecting and verifying customer identification information.
- Assessing the purpose and intended nature of the business relationship.
- Conducting ongoing monitoring of client transactions and activities to detect any unusual or suspicious behavior.

5. TRANSACTION MONITORING

SHAPEFY B.V. will implement robust transaction monitoring systems to detect and prevent suspicious activities. This includes:

- Monitoring transactions for any unusual patterns or behaviors.
- Conducting regular reviews of transaction records and account activities.
- Implementing automated monitoring systems where appropriate.

6. REPORTING

SHAPEFY B.V. will promptly report any suspicious transactions or activities to the appropriate authorities in accordance with applicable laws and regulations. Employees are encouraged to report any suspicions of money laundering to the designated compliance officer.

7. TRAINING AND AWARENESS

SHAPEFY B.V. will provide regular training to all employees on AML regulations, policies, and procedures. Training will cover topics such as recognizing suspicious activities, customer due diligence, and reporting requirements. Employees will also be provided with ongoing updates on changes to AML laws and regulations.

8. COMPLIANCE MONITORING AND REVIEW

SHAPEFY B.V. will regularly review and assess the effectiveness of our AML

policies, procedures, and controls to ensure compliance with applicable laws and regulations. This includes conducting internal audits, risk assessments, and compliance reviews.

9. RECORD KEEPING

SHAPEFY B.V. will maintain accurate and up-to-date records of all AML-related activities, including customer due diligence, transaction monitoring, and suspicious activity reports. Records will be retained in accordance with applicable laws and regulations.

10. CONCLUSION

In conclusion, **SHAPEFY B.V.** stands resolute in its commitment to combatting money laundering activities through the rigorous implementation of this Anti-Money Laundering (AML) Policy. With an unwavering dedication to integrity and compliance, we recognize the paramount importance of adhering to international standards and regulations set forth by esteemed bodies such as FATF/GAFI, the European Parliament, and the Council.

By aligning our practices with the recommendations of global authorities and the directives of the European Union, we fortify our defenses against the ever-evolving landscape of financial crime. Through robust customer due diligence, vigilant transaction monitoring, and proactive reporting of suspicious activities, we strive to maintain the highest standards of ethical conduct and regulatory compliance.

Furthermore, we recognize that our responsibility extends beyond mere compliance; it encompasses a commitment to safeguarding the integrity of the financial system as a whole. As such, **SHAPEFY B.V.** remains steadfast in its cooperation with law enforcement agencies and regulatory bodies, pledging full transparency and cooperation in the investigation and prosecution of illicit activities.

In fostering a culture of vigilance, education, and continuous improvement, we empower our employees to serve as frontline defenders against money laundering and illicit finance. Through ongoing training, awareness initiatives, and regular reviews of our AML procedures, we reinforce our collective resolve to uphold the integrity and trust upon which our company is built.

In embracing these principles, **SHAPEFY B.V.** reaffirms its position as a responsible corporate citizen, dedicated to fostering a secure and transparent financial ecosystem for all stakeholders. Together, we stand united in our pursuit of a future where financial integrity prevails, and illicit activities find no haven within our midst.

For Further Information:

If you would like to contact Shapefy B.V. Compliance team please e-mail:

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SHAPEFY B.V.

Managing Director

A handwritten signature in black ink, appearing to read 'K. Segredo', is written over a horizontal line.

Kevin Segredo