



POLICY

AML Policy

Anti-Money Laundering and Counter-Terrorist Financing Policy

Anti-money laundering and counter-terrorist financing measures pursuant to the Swiss Anti-Money Laundering Act (AMLA), FATF Standards and international requirements.

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Approved by: Board of Directors (Christoph Alois Weiss)

1. Purpose and Scope

1.1 Purpose

This AML Policy establishes the measures taken by ALVIAL Holding AG to prevent money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. It is based on the Swiss Federal Act on Combating Money Laundering and Terrorist Financing (AMLA) and the FATF Recommendations.

1.2 Scope

This Policy applies to all business relationships, transactions and services of the Company, in particular in the areas of corporate investments, financing transactions and cross-border capital flows in Switzerland and abroad.

2. Legal Framework

Legal Basis	Content and Requirements
Swiss AMLA	Federal Act on Combating Money Laundering and Terrorist Financing (SR 955.0). Duty of care, reporting obligations and organisational requirements.
FATF Standards	40 Recommendations of the Financial Action Task Force. Risk-based approach, transparency on beneficial owners.
AMLO-FINMA	FINMA Ordinance on the Prevention of Money Laundering and Terrorist Financing.
DAC8 (EU)	EU Directive on reporting obligations for crypto-assets and digital assets.
CO / SCC	Swiss Code of Obligations and Criminal Code (Art. 305bis SCC — Money Laundering).

3. Risk-Based Approach

3.1 Risk Assessment

The Company conducts a risk assessment for each new business relationship. The following factors are evaluated:

- Nature of the business relationship and the service offered
- Country of origin and geographic risk of the client
- Industry and business activities of the client
- Ownership structure and beneficial owners
- PEP status (Politically Exposed Person)
- Type and complexity of the transaction

3.2 Risk Classification

Risk Class	Criteria	Measures
Low	Regulated markets, transparent ownership, no PEP status, established companies	Standard KYC, annual update
Medium	Growth markets, complex structures, high transaction volumes, offshore elements	Enhanced KYC, semi-annual monitoring, management approval required
High	PEP or PEP environment, FATF high-risk countries, unclear ownership, cash payments	Enhanced Due Diligence, ongoing monitoring, Board approval required
Unacceptable	Sanctioned persons/countries, known criminal backgrounds, anonymous transactions	Reject business relationship, report to MROS

4. Due Diligence Obligations (Know Your Customer)

4.1 Simplified Due Diligence (Low Risk)

- Identification of the contracting party using official documents
- Basic sanctions list screening
- Documentation of the business relationship

4.2 Standard Due Diligence (Medium Risk)

- Full identification of natural and legal persons
- Establishment and verification of beneficial owners
- Understanding the purpose and nature of the business relationship
- Ongoing monitoring of the business relationship

4.3 Enhanced Due Diligence (High Risk)

- All measures of standard due diligence
- Obtaining additional information on source of funds
- Evidence of source of wealth
- Board of Directors approval required before commencing the business relationship
- Increased monitoring frequency (monthly)
- Documentation of all decisions with justification

5. Identification and Verification

5.1 Legal Entities

Document	Requirement
Commercial Register Extract	Current (not older than 3 months), original copy or certified copy
Articles of Association	Current version, dated and signed
Beneficial Owners	Identification of all persons with > 25% ownership or control
Financial Statements	Minimum 2 financial years, audited or internal
Organisational Chart	Full ownership structure down to natural person level
Sanctions Screening	Screening against EU, OFAC, UN and Swiss sanctions lists

5.2 Natural Persons

Document	Requirement
Official Photo ID	Passport or identity card, valid, original review or certified copy
Proof of Address	Not older than 3 months (utility bill, bank statement, official letter)
PEP Check	Screening against international PEP databases
Source of Funds	For transactions > CHF 100,000: evidence of origin of funds required
Source of Wealth	For high risk: evidence of origin of assets

6. Reporting Obligations

IMPORTANT: Any reasonable suspicion of money laundering or terrorist financing must be immediately reported to the Money Laundering Reporting Office Switzerland (MROS). The tipping-off prohibition (Art. 10a AMLA) must be strictly observed — the suspect must not be informed in advance.

6.1 Internal Reporting Chain

- Employee identifies suspicious activity → immediate internal report to the Compliance Officer
- The Compliance Officer reviews within 24 hours and decides on external reporting
- Upon confirmation of suspicion: report to MROS (www.fedpol.admin.ch) within 5 business days
- Simultaneously: freeze the affected transaction/business relationship pending clarification
- Full documentation of all steps and decisions

6.2 Exceptions to Reporting

There is no reporting obligation for information covered by professional secrecy or obtained exclusively for the purpose of providing legal advice.

7. Transaction Monitoring

7.1 Thresholds

Threshold	Measure
CHF 25,000 (cash transactions)	Written identification and documentation mandatory
CHF 100,000	Source of funds evidence required for all payment methods
Suspicious patterns	Regardless of amount: report upon suspicion of money laundering
Crypto transactions	Full documentation pursuant to DAC8; only regulated, duty-of-care compliant platforms

7.2 Red Flags — Warning Signals

- Unusually complex or incomprehensible transaction structures
- Frequent changes in ownership structure without economic justification
- Transactions with no apparent economic purpose
- Pressure for rapid execution without due diligence
- Payments to/from high-risk countries or tax havens

- Clients conducting excessive cash transactions
- Contradictory information on beneficial owners
- Transactions inconsistent with any plausible business purpose

8. Cryptocurrencies and Digital Assets

In accordance with DAC8 and FATF guidance on virtual assets, the following rules apply:

- Exclusive use of platforms demonstrably compliant with applicable due-diligence and reporting obligations
- Every crypto transaction must be fully documented via a recognised block explorer
- Full identification of all wallet addresses prior to transaction execution
- Travel Rule: for transfers > CHF 1,000 sender and recipient data must be transmitted

9. Record-Keeping and Documentation

All AML-relevant documents must be retained for a minimum of 10 years:

- KYC documents and identification records (10 years from end of business relationship)
- Transaction records and due diligence reports
- Internal and external reports (Suspicious Activity Reports)
- Risk assessments and decision records
- Training records and compliance reviews

10. Training and Awareness

- Induction of all employees and advisors upon joining / commencement of mandate
- Annual mandatory AML training (min. 2 hours)
- Ad hoc training upon new regulatory requirements
- Documented attendance confirmation for all training sessions

11. Responsibilities

Function	AML Responsibility
Board of Directors (Christoph Alois Weiss)	Overall responsibility; approval of AML Policy; escalation for high-risk decisions
Compliance Officer (Harro von Rosen, Head of Legal)	Operational AML responsibility; receipt of internal reports; contact with MROS
Employees / Advisors	Compliance with guidelines; identification of red flags; internal reporting



Function	AML Responsibility
Auditor (A+Z Treuhand und Beratung AG, Zug)	Annual review of AML processes and documentation

12. Final Provisions

This AML Policy is reviewed annually and updated immediately upon changes to legal requirements. Violations may result in disciplinary, civil and criminal consequences.

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