

**Annex 1**

to protocol of the Board of directors of Energy  
Invest Holding CJSC № 138, dated February 17, 2023

**ENERGY INVEST HOLDING**  
**CLOSED JOINT-STOCK COMPANY**

**POLICY**

The Anti-money laundering

**Yerevan 2023**

The Anti-money laundering policy (hereinafter referred to as "Policy") is an internal legal act of the CJSC "Energy invest holding" (hereinafter referred to as "Company").

## **Key terms**

**Money Laundering** - The process of concealing the criminal origin of money or other assets, so they appear to come from a legitimate source. Money laundering can take many forms and involve many types of assets. While money laundering is usually associated with drug trafficking or organized crime, it may arise in connection with any profit generating crime including bribery, corruption, extortion, human trafficking, fraud and tax fraud. Money laundering can also be used for the purposes of terrorist financing.

## **Introduction**

Money laundering is illegal, unethical and facilitates criminal conduct. Failure to address the risk of money laundering could undermine our reputation and lead to investigations, fines and/or other penalties for the Company.

This Policy sets out our Company's approach to ensuring that we comply with all applicable laws and regulations to prevent money laundering and appropriately manage money laundering risks.

The purpose of this Policy is to substantially prevent, manage and mitigate the risk that the Company and its employees become directly or indirectly involved in actual or potential money laundering activities, or terrorist financing activities.

This Policy is intended to help employees, contractors, partners and other third parties acting on the Company's behalf to understand where breaches of anti-money laundering laws might arise and to support them in making the right decisions in line with our corporate position as stated in this Policy.

## **Who does this apply to?**

This Policy applies to all employees, directors and officers, as well as contractors and partners of the Company.

## **What do we mean by money laundering and terrorist financing?**

Money laundering means exchanging money or assets that were obtained criminally for money or other assets that are 'clean'. The clean money or assets don't have an obvious link with any criminal activity.

The following types of activities are considered to be "money laundering" and are prohibited under this Policy:

- a. the conversion or transfer of property (including money), knowing or suspecting that such property is derived from criminal or certain specified unlawful activity ("Criminal property"), for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his action;
- b. conducting a financial transaction which involves criminal property;
- c. the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, ownership or control of criminal property;
- d. the acquisition, possession or use of criminal property;

- e. promoting the carrying on of unlawful activity; and
- f. participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions mentioned in the foregoing points.

The broad definition of money laundering means that anybody (including any employee) could be in violation of the law if he/she becomes aware of, or suspects, the existence of criminal property within the business and becomes involved in or continues to be involved in a matter which relates to that property being linked to the business without reporting his/her concerns.

Property can be criminal property where it derives from any criminal conduct, whether the underlying criminal conduct has taken place in the country where you are situated or overseas.

Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will later be used for criminal purposes.

### **What is our commitment?**

We do not assist, support, participate in or permit money laundering or terrorist financing. We do not accept money or other assets if we know or suspect that they derive from any kind of criminal activity. We do not knowingly deal with criminals, suspected criminals or the proceeds of crime. We do not facilitate the acquisition, ownership or control of criminal proceeds or other assets deriving from criminal activity nor do we assist others in concealing criminal proceeds or assets. We do not tolerate tax evasion of any kind and we do not knowingly or willfully facilitate tax evasion.

To manage our money laundering risk exposure and ensure compliance, we make all payments under our contracts to, and receive payments from, our contractual counterparties. We require employees to be alert to any unusual or suspicious arrangements which could expose us to the risk of money laundering or the facilitation of tax evasion.

We comply with all applicable laws and regulations wherever we conduct business, enter into, or maintain business relationships. It is Company's Policy to comply with all applicable anti-money laundering laws in our operations worldwide. To this end, we only conduct business with partners who are involved in legitimate business activity and whose funds are derived from legitimate sources.

We examine, as far as reasonably possible, the background and purpose of all complex and unusually large transactions, and all unusual patterns of transactions, which have no apparent economic or lawful purpose. We increase its degree and nature of monitoring of the business relationship, in order to determine whether those transactions or activities appear suspicious.

Consistent with a risk-based approach, we will, before the establishment of a business relationship or the carrying-out of a transaction, as part of all due diligence measures that are applied to such business relationship or transaction:

- identify and verify the identity of its counterparty and the (ultimate) beneficial owner(s);
- assess the level of risk such counterparty could present.

All Employees are obliged to cooperate fully with the appropriate governmental authorities responsible for combating Anti-Money Laundering, if required. If needed, this could include reporting suspicious transactions and cooperating with the authorities, or inform promptly, on their own initiative, the appropriate authority when they know, suspect or have reasonable grounds to

suspect that money laundering, an associated predicate offence, or terrorist financing is being committed or has been committed or attempted.

### **Speaking openly**

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of this Policy with their manager, supervisor or via other available reporting channels.

### **Consequences**

Our Policy supports our values and reflect what is important to our Company. We take breaches of our Policy seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment and inform competent authority.

This Policy may be updated from time to time, and the updated version of the Policy will be immediately made available on our website.