Approved by Order No. 01-28
of the Director of **Rioni Capital LLC**
________________________ Badri Gobechia
dated *11 December* **2025**

Brokerage Company "Rioni Capital"
Anti-Money Laundering and Counter-Terrorist Financing

POLICY

(Public Version)

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1. General Information and Purpose

LLC "Rioni Capital" (hereinafter – the **Company**) is a brokerage company operating in accordance with the legislation of Georgia and pays particular attention to the prevention of money laundering and terrorist financing (AML/CFT).

The objectives of the Company's AML/CFT Policy are:
- prevention of the use of the Company's services for unlawful purposes;
- protection of clients, partners and the financial system;
- ensuring compliance with Georgian and international AML/CFT standards;
- effective cooperation with supervisory authorities.

The Company considers AML/CFT compliance not only as a legal obligation, but also as an integral part of corporate responsibility and ethical business conduct.

2. Legislative and Regulatory Framework

The Company's AML/CFT Policy is based on the following legislative and regulatory acts:
- the Law of Georgia "On Facilitating the Prevention of Money Laundering and Terrorist Financing";
- the Law of Georgia "On the Securities Market";
- normative acts of the National Bank of Georgia;
- regulations and guidelines of the Financial Monitoring Service of Georgia (FIU Georgia);
- FATF Recommendations;
- MONEYVAL assessments and international best practices.

This Policy shall be regularly reviewed and updated in the event of legislative or regulatory changes.

3. Risk-Based Approach (Risk-Based Approach)

The Company applies a risk-based approach (RBA), within which:
- money laundering and terrorist financing risks are identified;
- risks related to clients, products, transactions and geographical factors are assessed;
- proportionate preventive measures are applied.

Clients and transactions are classified as low-, medium- or high-risk.
In high-risk cases, enhanced control measures are applied in accordance with the legislation.

4. General Principles of Client Acceptance

The Company does not establish or continue business relationships with persons who:
- are subject to international or national sanctions;
- are associated with money laundering, terrorist financing or other serious financial crimes;
- refuse to undergo identification or to provide information;
- provide the Company with false or misleading information.

The Company reserves the right to refuse service if the relationship exceeds the Company's risk tolerance framework.

5. Client Identification and Verification (KYC)

The Company performs client identification and verification prior to the commencement of services and, where necessary, during the course of the business relationship.

The purposes of the identification and verification process are:
- confirmation of the client's identity;
- identification of the beneficial owner (in the case of legal entities);

- identification of sanctions and politically exposed persons (PEP).

The following shall not be permitted:

- opening of anonymous accounts;
- servicing of unidentified or unverified clients.

6. Politically Exposed Persons (PEP)

Politically exposed persons, their family members and persons closely associated with them are considered as a high-risk category.

In such cases, the Company applies enhanced preventive measures, including:

- requesting additional information;
- enhanced monitoring of the business relationship;
- special assessment of the decision to continue servicing.

7. Transaction Monitoring

The Company carries out continuous monitoring of clients' activities and transactions in order to:

- identify unusual or suspicious behavior;
- ensure that transactions are consistent with the client's profile and declared activities
- fulfill obligations imposed by AML/CFT legislation.

In the presence of suspicious circumstances, the Company acts in accordance with the legislation of Georgia.

8. Reporting of Suspicious Transactions

The Company is obliged to submit information to the Financial Monitoring Service of Georgia regarding suspicious transactions or actions when there is a reasonable suspicion that they are related to:

- money laundering;
- terrorist financing;
- violation of sanctions regimes;
- other serious financial crimes.

Reporting is based on suspicion and not solely on the volume of a transaction.

9. Sanctions and Targeted Financial Sanctions (TFS)

The Company fully and immediately complies with applicable sanctions regimes, including:

- resolutions of the United Nations Security Council;
- sanctions of the European Union;
- sanctions lists of the U.S. Office of Foreign Assets Control (OFAC);
- requirements established by the legislation of Georgia.

Servicing of sanctioned persons is prohibited, and freezing of assets is carried out in accordance with the procedure established by law.

10. Confidentiality and Data Protection

The Company ensures protection of clients' personal and financial data in accordance with the principle of confidentiality.

- information is processed solely for purposes defined by law;
- access is restricted to authorized persons;
- modern data security standards are applied.

The Company does not disclose client information except in cases directly provided for by law.

11. Account Restriction, Suspension or Closure

The Company is entitled to restrict, suspend or close a client's account if:

- an AML/CFT risk exists;
- the client fails to comply with statutory requirements;
- the relationship exceeds the Company's risk tolerance framework;
- a relevant instruction is received from a competent authority.

In the event of account closure, return of assets is carried out in accordance with the procedure established by law.

12. Cooperation with Supervisory Authorities

LLC "Rioni Capital" cooperates with:

- the National Bank of Georgia;
- the Financial Monitoring Service of Georgia;
- other competent authorities

in the forms, within the timeframes and to the extent established by law.

13. Policy Update

The Company reserves the right to update this Policy at any time:

- in the event of legislative changes;
- in the event of changes in regulatory requirements;
- in the event of changes in the risk profile.

The updated version is published on the Company's official website.