

ANTI-MONEY LAUNDERING (AML), COUNTER-TERRORIST FINANCING (CTF) AND ANTI-BRIBERY & CORRUPTION POLICY STATEMENT

Money laundering and terrorist financing have been identified as a major threat to the international financial services community. Many countries have passed legislation designed to prevent money laundering and to combat terrorism. This legislation, together with regulations, rules and industry guidance, form the cornerstone of AML / CTF obligations for firms and outlines the offences and penalties for failing to comply.

Instinet Germany GmbH (“IGG” or “Instinet” or “the firm”), is authorised by the Federal Financial Supervisory Authority (German: Bundesanstalt für Finanzdienstleistungsaufsicht; the BaFin) and regulated by the BaFin and Deutsche Bundesbank. IGG is committed to the highest standards of Anti-Money Laundering (AML), Combatting Terrorist Financing (CTF), and Anti-Bribery and Corruption (ABC) and like other entities within the Instinet Group, IGG is responsible for having controls in place in order to comply with local legislation, regulations and any government approved guidance in the jurisdiction(s) in which they operate.

As Germany is a member state of the Financial Action Task Force (FATF) and the European Union (EU), enacted recommendations and laws fully apply to IGG. IGG may have additional local policies and procedures designed to comply with the local legislation, regulations and any government approved guidance in the jurisdiction(s) in which it operates.

Instinet Policies:

The European Compliance Department and designated AML-Officer owns and is responsible for the following internal written policies covering:

1. Financial Crime Policy Standard (AML / CTF, and Sanctions); and
2. Anti-Bribery & Anti-Corruption Policy Standard (ABC).

These policies, written procedures, and regular training for employee, are designed to ensure that IGG complies with all applicable legal and regulatory requirements, including any other obligation for regions it which it operates.

Financial Crime Controls

Instinet’s AML / CTF and Sanctions control framework is designed to ensure that all its European offices comply with the requirements set out under EU legislation, regulations, rules and industry guidance for the financial services sector, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used as a conduit of financial crime. The AML / CTF control framework is also designed to ensure that the firm complies with applicable sanctions laws in every jurisdiction in which it operates. As such IGG is required, as a minimum, perform sanctions screening, for e.g., United Nations (UN) and EU Sanctions lists, in all our business dealings.

Anti-Bribery and Corruption

Instinet prohibits all relevant bribery offences, including but not limited to, inducing, or rewarding, any person to perform an improper act intended to gain an advantage or avoid a negative outcome by entering into activity that could constitute a form of bribery. The prevention, detection and reporting of bribery offences are the responsibility of all Instinet staff. Instinet also prohibits its staff to threaten or take action against another member of staff who has refused to commit a bribery offence or who has raised bribery concerns. ABC risks posed to Instinet are limited due to its business

model, and regions of operation, however all staff must constantly assess the application of this policy in their dealings and apply both the spirit and defined rules of this policy when performing their duties.

Governance and Conformance

IGG's policies are endorsed by the Management Board and implemented by the European Compliance Department and MLRO. Regular reviews of the effectiveness of these policies are carried out in addition to audits periodically undertaken by both internal and external auditors.

All Instinet staff, which includes each executive board member and each person (whether salaried or non-salaried) employed or engaged on a full time, part-time, fixed term, as a trainee, in a contract or in a temporary role, or on secondment or transfer from other companies, including interns and freelancers/contractors, are required to comply with Instinet's Financial Crime Policy and Anti-Bribery & Anti-Corruption Policy.

AML/CTF and Sanctions Control Framework

To facilitate compliance with AML / CTF and Sanctions laws, IGG has developed and implemented a comprehensive control framework, consisting of training, policies, procedures and internal systems and controls. This includes, but is not limited to:

- The appointment of a Money Laundering Reporting Officer (MLRO) who is of sufficient seniority, who has the responsibility for oversight of compliance with relevant legislation, regulations, rules and industry guidance;
- Establishing and maintaining a 'risk-based approach' towards assessing and managing the money laundering and terrorist financing risks of the firm; establishing and maintaining risk-based customer due diligence, identification, verification and Know Your Customer (KYC) procedures. This includes enhanced due diligence for those customers presenting higher risk, such as Politically Exposed Persons (PEPs);
- Establishing and maintaining risk based systems and procedures to monitor ongoing customer activity;
- Procedures for the identification and reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate;
- The maintenance of appropriate records for the minimum periods prescribed by law;
- Training and detailed policies, providing all staff with detailed Financial Crime knowledge; and
- The provision of appropriate management information and reporting to senior management of the firm's compliance with the requirements.

European Compliance, October 2023