

Anti-Money Laundering Policy

Siegfried is committed to preventing money laundering and related financial crimes. We implement rigorous internal controls to ensure that all financial transactions are conducted with integrity, strictly for legitimate business purposes, and exclusively with properly identified and approved counterparties.

By adhering to these principles, we uphold our commitment to maintaining the highest standards of compliance and transparency in every aspect of our operations. For further information, please refer to our Code of Business Conduct.

Scope

This Policy applies to all Siegfried employees, officers, and relevant third parties involved in procurement, treasury, payment execution, and related financial activities.

Key Statement

Siegfried maintains appropriate and proportionate internal controls across its procurement, treasury, and payment activities to mitigate the risk of money laundering, sanctions breaches, and other financial crimes.

Vendor Onboarding and Due Diligence

Vendors are onboarded through a structured procurement process. Relevant vendor and banking information is subject to internal review and approval in accordance with established procedures. Only vendors that have successfully completed the required onboarding and validation steps may be engaged for business purposes.

Payment Controls and Treasury Oversight

Payments are made only after all required validations have been completed. The Treasury function acts as a key control and represents the final step prior to payment execution, providing independent oversight to ensure that all internal requirements and approvals have been met.

Segregation of Duties and Four-Eyes Principle

Siegfried applies clear segregation of duties between procurement, treasury, and payment functions. In addition, a documented four-eyes principle applies to all treasury transactions and payment activities, requiring review and approval by at least two authorized individuals. These controls help mitigate the risk of error, misuse, and internal or external fraud.

Sanctions and Regulatory Compliance

Siegfried remains alert to sanctions and regulatory risks and relies on information from its banking partners and internal controls to identify potential issues. Where concerns arise, payments are suspended and reviewed in accordance with internal escalation and approval procedures.

Record Retention, Training, and Review

Siegfried maintains appropriate records relating to vendor onboarding, approvals, and payment activities. Employees receive relevant training, and controls are periodically reviewed to ensure ongoing effectiveness and compliance with applicable laws and regulations.

Our Framework

This Policy forms part of Siegfried's overall compliance framework and supports compliance with applicable anti-money laundering and sanctions regulations. Adherence to this Policy is essential to maintaining Siegfried's reputation for integrity and ethical business practices. For further information, please refer to the Code of Business Conduct.

Speak up culture

In case of an observed or suspected breach, Siegfried employees and representatives are encouraged to speak up to the Siegfried Integrity Office using one of the various reporting channels. The Siegfried Integrity Office ensures that no retaliatory measures are taken for all reports submitted in good faith.

Code of Business Conduct

The Code of Business Conduct addresses money-laundering-related risks by stating that **(i)** employees and representatives must avoid all legal breaches and comply with all applicable laws and the underlying Legal Compliance Manual; **(ii)** any form of fraud, embezzlement, misappropriation, theft, management fraud, or other offenses against property, including the falsification of financial data, reports, balance sheets or other documents, is strictly prohibited; **(iii)** financial and business data must be accurate, controlled, and protected against manipulation or misuse; **(iv)** bribery, kick-back payments, facilitation payments, and other unjustified financial advantages are prohibited; and **(v)** transactions involving goods, services or funds connected to sanctioned countries, sanctioned individuals, or persons possibly involved in criminal or terrorist activities are prohibited and must comply with applicable trade control and embargo laws.

Do you need further information
on this policy or want to ask for advice?
Do you want to report a concern?
Visit siegfried.ethicspoint.com

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