

Financial Crime Prevention Policy

Galileo Green Energy GmbH

1. Purpose

Galileo Green Energy GmbH ('GGE') and its subsidiaries recognise that financial crime in all its forms is a threat to the Group and its investors and all other stakeholders. It is committed to the prevention of financial crime including, but not limited to, money laundering, the funding of terrorist activity, bribery and corruption, as well as fraud and market abuse. Through the implementation of risk-based internal procedures, policies, as well as systems and controls, GGE strives to ensure that high standards of crime prevention and awareness are maintained by all directors, employees, contractors and consultants alike, whether under a contract of employment, a contract of service, or otherwise.

Through the financial crime policy and all relevant procedures we aim to prevent, deter, detect and investigate all forms of financial crime.

2. Anti-Money Laundering (AML)

The company's anti-money laundering (AML) procedures are designed to ensure compliance with the requirements and obligations set out in relevant legislation, regulations, rules and industry guidance. This policy includes the appointment of a Money Laundering Reporting Officer (MLRO) who has responsibility for oversight of the company's compliance with the relevant legislation, regulations, rules and industry guidance.

- GGE provides all staff with relevant AML training.
- In order to protect clients and GGE from financial crime, stringent standards of partner/supplier due diligence are maintained, and it is understood that where verification of identity is required and cannot be completed, we may not be able to proceed with the relationship.
- Politically Exposed Persons (PEPs) will be identified and additional controls such as enhanced due diligence in relation to deals with PEPs shall be implemented.
- Where sanctions or restrictions on activity with respect to targeted individuals, countries, governments or entities are imposed by the UN or individual countries, GGE will comply with those sanctions or restrictions.
- Should a partner/supplier become a sanctioned party, GGE will report to the appropriate authorities and comply with all further instructions from said authorities.
- Staff are required to report any knowledge or suspicion of financial crime to the MLRO. Where appropriate, these concerns are reported to the relevant law enforcement and/or regulatory authorities and we will also support law enforcement agencies to detect and confiscate criminal proceeds.

3. Anti-Bribery and Anti-Corruption (ABC)

- GGE will at all times operate fairly and transparently and act proportionately to comply with the relevant bribery and corruption legislation.
- Corruption, bribery and unfair or anti-competitive practices have a negative effect on the workplace and our business, GGE, takes pride in its ethical approach to doing business. We insist on integrity from our staff and expect the same from all those that we do business with.
- Bribery may include the offering, promising, giving, accepting or soliciting of a financial or other advantage as an inducement or reward for an action which is illegal, improper or a breach of trust. GGE has implemented appropriate procedures and controls to prevent bribery, where feasible. GGE expressly prohibits staff from making facilitation payments and claiming these on expenses.
- GGE is committed to taking all reasonable steps to ensure that our stance is communicated to all of our contractors, suppliers and intermediaries (contracting parties). GGE expects, under the terms of our legal agreements, that contracting parties shall at all times comply with all applicable laws, regulations, sanctions relating to anti-bribery relevant to the territories in which they operate.

4. Anti-Fraud

GGE does not tolerate fraud or dishonesty and will investigate all instances where fraud is suspected either internally, with related parties, or with external organisations. Penalties include dismissal and/or prosecution of any staff defrauding or attempting to defraud GGE or its stakeholders and prosecution of any external parties.

5. Market Abuse

GGE is committed to ensuring that all its staff and connected parties comply with the insider dealing and market abuse laws and regulations. Compliance with the law on insider dealing and market abuse forms a condition of contract for all staff (see: Conflict of Interest Policy).

All staff must not deal securities while having knowledge of inside information or encourage others to deal. They must also ensure that as insiders they must not disclose inside information.

6. Tax Evasion

GGE is committed to preventing persons associated with GGE from engaging in criminal facilitation of tax evasion. They foster a culture within GGE in which activity to facilitate tax evasion is understood to be a financial crime, and never acceptable.

7. Roles and Responsibilities

The CEO is responsible for implementing the policy and ensuring it is operating effectively.

The Board is responsible for reviewing the Policy on at least a biennial basis and providing overall oversight in relation to the management of financial crime risk.

Authority to approve	GGE Board
Policy owner	CEO
Current version	2024-12-04 Galileo Financial Crime Prevention Policy v3.0
Approval date	December 2024
Review Cycle	Biannual
Due for review	December 2026
Status	Draft

Version Control

Version	Revision Date	Author	Description
1.0	3/12/2020	IWI	Final for Board approval
2.0	06/12/2022	CFO	Final for Board approval
3.0	05/12/2024	CFO	Final for Board approval

Material Changes from Previous Versions

Section	Page	Change Description

Related Policies

Document Title	Document Location	Key Contact
Code of Ethics	Sharepoint	General Counsel
Conflicts of Interest	Sharepoint	General Counsel