

## ANTI MONEY LAUNDRY POLICY

### Purpose

The purpose of this policy is to establish clear guidelines and procedures for Dutch Health to prevent and combat money laundering effectively. By implementing this policy, we aim to protect our company from being involved in any illegal activities while contributing to the overall integrity of the financial system.

### Policy Statement

Dutch Health is committed to maintaining a robust anti-money laundering program and will adhere to the following core principles:

- a. **Identification and Verification:** Dutch Health shall implement appropriate measures to verify the identity of customers, clients, and any other relevant parties involved in financial transactions. This includes obtaining necessary identification documents and keeping records of such information.
- b. **Risk-Based Approach:** A risk-based approach shall be followed when conducting customer due diligence, taking into consideration the nature of the business relationship, transaction type, and other relevant factors. Enhanced due diligence measures shall be applied to high-risk customers or transactions.
- c. **Monitoring and Reporting:** Dutch Health shall implement robust monitoring systems to detect and report any suspicious activities or transactions that may be indicative of money laundering, terrorist financing, or other illicit activities. Employees shall be vigilant and promptly report any suspicions to the designated individual(s) responsible for AML compliance.
- d. **Record Keeping:** Dutch Health shall maintain accurate records of all customer transactions, identification documents, and any suspicious activity reports (SARs) filed with the relevant authorities, as required by law.
- e. **Training and Awareness:** Dutch Health shall provide regular training and awareness programs to educate employees about money laundering risks, the requirements of this policy, and the importance of their roles in preventing and detecting suspicious activities. Training sessions shall be conducted upon hiring and periodically thereafter to ensure employees remain up-to-date with AML regulations and procedures.
- f. **Internal Controls and Audits:** Dutch Health shall establish and maintain internal controls to ensure the effectiveness of our AML program. Regular audits and reviews shall be conducted to assess compliance with this policy and identify areas for improvement.

### Designation of Responsibility

Dutch Health designates the following individual(s) responsible for overseeing the implementation and enforcement of this policy:

Pieter Wiemers – Managing Director – [pieter@dutch-health.com](mailto:pieter@dutch-health.com) - +31 6 27656700

### Reporting and Non-Retaliation

Employees are encouraged to report any suspected violations of this policy, including concerns related to money laundering or suspicious activities, without fear of retaliation. Reports can be made to the designated individual(s) responsible for AML compliance, and appropriate measures will be taken to protect the confidentiality of the reporter.

### Compliance

Dutch Health shall ensure compliance with all applicable AML laws, regulations, and guidelines. The designated individual(s) responsible for AML compliance shall regularly review and update this policy to reflect changes in the regulatory environment and the company's operations.

### Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment, in accordance with company policies and procedures.

Additionally, violations of this policy may expose the company

Nederhorst den Berg, 5 JANUARY 2025