

AML & Compliance Statement - Green Energy SIA

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Green Energy SIA

Reg. No. 40203415791 | Riga, Latvia

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1. Statement of Compliance

Green Energy SIA complies with all applicable anti-money laundering (AML), counter-terrorist financing (CTF) and sanctions legislation. The Company operates under the laws of the Republic of Latvia and within the regulatory framework of the European Union, including the EU Anti-Money Laundering Directives.

The Company does not facilitate, knowingly participate in, or tolerate any transaction that is or may be connected to money laundering, terrorist financing, sanctions evasion or other financial crime.

2. Regulatory Framework

The Company's AML compliance programme is designed to meet the requirements of: Latvian Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing (NILLTPFN).

EU Anti-Money Laundering Directives (AMLD4/5/6).

EU financial sanctions regulations administered by the European External Action Service.

UN Security Council sanctions regimes.

3. Know Your Customer (KYC)

Prior to entering into a commercial relationship, Green Energy SIA conducts KYC procedures proportionate to the assessed risk level of the counterparty. Standard KYC includes: Verification of the counterparty's legal identity (registration documents, articles of association).

Identification and verification of ultimate beneficial owners (UBO) holding 25% or more.

Screening against EU, UN and OFAC consolidated sanctions lists.

Assessment of the counterparty's business purpose and expected transaction profile.

Enhanced due diligence is applied where the counterparty is established in a high-risk jurisdiction, is a politically exposed person (PEP), or where the transaction structure presents elevated risk indicators.

4. Transaction Monitoring

The Company monitors commercial transactions for indicators of unusual or suspicious activity, including:

Transactions inconsistent with the counterparty's stated business profile.

Payment instructions involving unrelated third parties.

Requests to make payments in cash or through unusual payment channels.

Unusual urgency or reluctance to provide required documentation.

5. Suspicious Activity Reporting

Where the Company identifies grounds for suspicion of money laundering or terrorist financing, the matter is escalated to the responsible board member and a report is submitted to the Latvian Financial Intelligence Unit (FIU) in accordance with applicable law. The Company does not tip off counterparties in such circumstances.

6. Record Retention

KYC documentation and transaction records are retained for a minimum of five years from the date of the transaction or the end of the commercial relationship, whichever is the later.

7. Responsibility

The Board Members is responsible for AML compliance. All personnel with client-facing or transactional responsibilities receive appropriate awareness training on AML obligations and the identification of risk indicators.

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