VERSION
2.0 · 4 November 2026

AML AND SANCTIONS POLICY

INFORMATION DOCUMENT | ACT NO. 297/2008 COLL. | REG. (EU) 833/2014 · 269/2014 | EN

COMPANY
Vanquard Holdings s. r. o.
Company ID (IČO)
57 447 578
Registered office
Svätoplukova 2B, 821 08 Bratislava

COMPANY
APZ Ventures, s. r. o.
Company ID (IČO)
53 328 094
Registered office
Pavla Horova 6142/11, 841 08 Bratislava

COMPANY
G Group Holding, s. r. o.
Company ID (IČO)
36 238 872
Registered office
Bajkalská 5/A, 831 04 Bratislava

Version	Approved	Nature	Contact
2.0	4 November 2026	information document	info@ghub.international

ART. 1 PURPOSE AND SCOPE

1.1 This document is for information purposes. It summarises the principles that Vanquard Holdings s. r. o., APZ Ventures, s. r. o. and G Group Holding, s. r. o. (the "companies") apply in their vehicle trade under the G-HUB International brand to prevent the laundering of proceeds of crime, terrorist financing and breaches of international sanctions.

1.2 Detailed procedures are set out in the companies' internal directive, which is available to banks and competent authorities on request.

1.3 This document is issued in Slovak, English, German and Polish. In case of any discrepancy, the Slovak version prevails.

ART. 2 LEGAL FRAMEWORK

2.1 The programme is based on Section 20 of Slovak Act No. 297/2008 Coll. on the Protection against the Legalisation of Proceeds of Crime and on the Protection against Terrorist Financing.

2.2 We fulfil the duties of an obliged entity in full, regardless of whether that status arises for us under the law.

2.3 In the area of sanctions we follow Council Regulations (EU) No 833/2014 and No 269/2014, other EU restrictive measures and Slovak Act No. 289/2016 Coll. on the Implementation of International Sanctions.

2.4 Before Regulation (EU) 2024/1624 starts to apply, we will adapt the programme to its regime.

ART. 3 CUSTOMER DUE DILIGENCE

3.1 Before concluding any transaction we identify and verify the customer, its statutory body and its ultimate beneficial owners, and we establish the purpose of the transaction and the source of funds.

3.2 We do not conclude a transaction until customer due diligence has been completed.

3.3 We accept payments exclusively by bank transfer in EUR.

PROHIBITION WITHOUT EXCEPTION EU, UN and US sanctions regimes

ART. 4 RUSSIA, BELARUS AND SANCTIONED COUNTRIES

4.1 We do not sell, export or otherwise supply vehicles to Russia or Belarus or for use in those countries, whether directly or indirectly, through third countries, intermediaries or related persons. The prohibition applies to every vehicle regardless of its value, type of propulsion or engine capacity.

4.2 Likewise, we carry out no transactions with the following end destinations:

- DPRK (North Korea),
- Iran,
- Cuba,
- Crimea and Sevastopol,
- non-government-controlled areas of Ukraine,
- any other country or territory under a comprehensive embargo of the European Union, the United Nations or the United States.

4.3 Any indication of circumvention of these prohibitions results in the immediate termination of the transaction and of the relationship with the customer and may lead to a report to the competent authorities.

ART. 5 SANCTIONS SCREENING

5.1 We screen the customer, its statutory body, all owners in the ownership structure and other persons involved in the transaction against the sanctions lists of the European Union, the United Nations, the United States (OFAC) and the United Kingdom. Screening is repeated during the course of the transaction.

5.2 We do not conclude a transaction if a sanctioned person holds any interest in or controls the customer, or has any role in the transaction.

5.3 Where a link to sanctions is identified, we proceed in accordance with Slovak Act No. 289/2016 Coll.

ART. 6 END DESTINATION AND RE-EXPORT

6.1 The final destination forms part of the purchase agreement. We verify it with documents evidencing transport, exit from the European Union and delivery.

6.2 Where the final destination cannot be verified or there is an unexplained risk of diversion, we do not conclude or continue the transaction, irrespective of the apparent credibility of the direct buyer.

COMMITMENT Art. 12g of Council Regulation (EU) No 833/2014

6.3 Our purchase agreements contain a binding prohibition on re-exporting the vehicles to Russia and Belarus and on their use in those countries, including contractual consequences for breach. We apply this clause voluntarily also to vehicles not covered by the obligation under Article 12g of Council Regulation (EU) No 833/2014.

ART. 7 REPORTING AND COOPERATION

7.1 We report unusual transactions to the Slovak Financial Intelligence Unit (Finančná spravodajská jednotka).

7.2 We provide information and documents to banks and competent authorities to the extent required by law.

ART. 8 GOVERNANCE

8.1 The statutory bodies of the companies are responsible for the programme.

8.2 Persons involved in transactions receive training.

8.3 We update the programme when legislation or sanctions regimes relevant to our activity change. The version with the highest number published on the website applies.