

AML & SANCTIONS

COMPLIANCE

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Public summary of the group's programme for the prevention of money laundering, terrorist financing and breaches of international sanctions.

Subject	Prevention of money laundering, terrorist financing and breaches or circumvention of international sanctions
Character	Standard adopted voluntarily and applied in full to every transaction
Business activity	Cross-border sourcing and sale of premium and luxury vehicles (B2B), within the EU and to third countries
Legal basis	Slovak Act No. 297/2008 Coll.; Council Regulations (EU) No 833/2014, No 269/2014 and No 765/2006; Slovak Act No. 289/2016 Coll.
Responsibility	Statutory body of each group company

This is a public summary. The full internal programme is provided to banks, financial institutions and public authorities on request.

1. Introduction and legal framework

G-HUB International operates in the cross-border sourcing and re-export of premium and luxury vehicles between the EU and international markets. Our compliance framework is built around EU anti-money laundering, counter-terrorist financing, and international sanctions requirements.

High-value goods and cross-border payments belong to a sector that banks and supervisory authorities examine with heightened attention. We do not deny the risk; the controls below are designed to eliminate it, and we apply them in the same way to every transaction, regardless of the customer's country.

Legal basis. Our internal programme is structured in line with Slovak Act No. 297/2008 Coll. on the Prevention of Money Laundering and Terrorist Financing. We adopted it voluntarily and apply it to the extent of an obliged entity.

Sanctions. Our sanctions controls are based on Council Regulations (EU) No 833/2014, No 269/2014 and No 765/2006 and on Slovak Act No. 289/2016 Coll. on the Implementation of International Sanctions.

Risk assessment. The programme rests on a written risk assessment, which we review at least annually and whenever our business model, target markets or the applicable legislation change.

2. Know Your Customer (KYC) & due diligence

Before every transaction. We conduct customer due diligence on all counterparties prior to any transaction, including verification of identity, beneficial ownership and the source of funds.

Identification. Customers are identified and verified from official registers. We also establish the purpose of the transaction, including the country of final destination.

New customers. A new customer goes through a video call or an in-person meeting with the person authorised to act for the customer.

Who we deal with. Outside the EU we sell exclusively to legal entities. We do not deal with state-owned or listed companies, with intermediaries, or with politically exposed persons (including their family members and close associates).

Ownership structure. If the ownership structure cannot be traced to natural persons, the transaction does not proceed.

3. Payments

Banking channels only. All transactions are settled exclusively through regulated banking channels: by bank transfer, in EUR, to accounts held with banks in the EU. We do not accept cash payments or crypto-assets.

Third parties. We do not accept payments from third parties. An exception may be granted only after prior written approval and screening of the payer.

4. Sanctions & export compliance

4.1 Screening

Lists and timing. Every transaction is screened against EU, UN, OFAC and UK sanctions lists before execution, and re-screened on an ongoing basis.

Who is screened. We screen the customer, persons acting on its behalf, its ultimate beneficial owner, its owners, the end user, the supplier, the carrier and, where a third-party payment has been approved, the payer.

Sanctioned persons. A transaction does not proceed if a sanctioned person holds any interest in the customer or controls it.

Matches. Until a potential match is demonstrably ruled out, we do not accept payment and do not hand over the vehicle. In the case of a confirmed match, the transaction is not carried out and the matter is reported to the competent authority.

4.2 Prohibited destinations

We do not supply vehicles to Russia, Belarus, North Korea, Crimea, Sevastopol and the non-government-controlled areas of Ukraine, Iran, or any other territory under a comprehensive embargo.

4.3 End-use and end-destination verification

Declaration and verification. We verify the intended end-use and end-destination of each vehicle and require a documented buyer declaration of final destination. The country of final destination is stated in the contract and verified from independent sources.

Transport. Transport is arranged by the buyer through a carrier, which we screen.

Certificate of conformity and key. We retain the certificate of conformity (COC) and the vehicle key until delivery or exit from the EU is evidenced:

Destination	COC and key retained until	Customer provides
Within the EU	the customer proves delivery	Declaration of delivery, transport document and photo documentation from the country of destination
Third countries	we verify the vehicle's exit from the EU	Then the same declaration of delivery, transport document and photo documentation from the country of destination

4.4 No re-export clause

Our sales contracts include a binding no re-export to Russia or Belarus clause, consistent with Council Regulation (EU) No 833/2014. In it the customer undertakes not to sell, transport, export or make the vehicle available, directly or indirectly, to those states or for use in them, and to pass this obligation on to every subsequent acquirer. In the KYC/AML questionnaire the customer also declares that the vehicle will not go to any other country covered by EU sanctions prohibitions. We apply the clause also to passenger cars, where the regulation does not expressly require it.

4.5 When we do not proceed

We do not enter into or complete a transaction if:

- there is any link to Russia, Belarus or another prohibited destination;
- a screening match has not been demonstrably ruled out;
- the customer or a person acting for the customer is a politically exposed person;
- the ownership structure cannot be traced to natural persons;
- the customer refuses the clause, the statement of the final country or cooperation with verification;
- the end destination cannot be verified, or an unexplained inconsistency or risk of onward diversion persists between the contractual destination and the circumstances of the transaction.

Principle of caution. We apply this regardless of the apparent legitimacy of the immediate buyer. Losing a deal is always preferable to taking a sanctions risk.

5. Unusual transactions & reporting

Every employee and collaborator must immediately report to the responsible person any circumstance suggesting an unusual transaction. Unusual transactions are reported without undue delay to the financial intelligence unit; neither the customer nor third parties are informed of the report. A person who reports a suspicion in good faith is protected against retaliation.

6. Governance

Responsibility. Ultimate responsibility for compliance rests with the statutory body of each group company.

Training. Employees and collaborators complete induction training and training at least annually.

Internal review. Compliance with the programme is reviewed internally at least once a year on a sample of transactions.

Records. Transaction records (contracts, KYC questionnaires, screening reports, transport and export documents) are kept for five years after the end of the business relationship, or longer where the law requires.

Updates. Our procedures are reviewed periodically and updated to reflect regulatory developments in the EU AML and sanctions framework.

7. Risk assessment – summary

Factors. We assess risk across the following factors: customer, geography, product, transaction, end-destination and transport, payments, and suppliers.

Markets. Target markets are classified into three categories: the EU, third countries, and third countries under special monitoring. The category does not reduce the scope of controls; the same scope applies to every transaction.

Priority. We pay the most attention to the end-destination of vehicles in third countries, and controls in this area take priority in internal reviews.

8. Preparing for Regulation (EU) 2024/1624 (AMLR)

We are aligning the programme with the incoming EU Anti-Money Laundering Regulation (EU) 2024/1624, which extends direct obligations to high-value vehicle dealers from July 2027: dealers in motor vehicles with a price above €250,000 become obliged entities on 10 July 2027. We

already conduct customer due diligence, identification of ultimate beneficial owners and documentation of the source of funds to a standard compatible with the Regulation, and we will update the programme before it takes effect.