

Anti-Money Laundering (AML) & Counter-Terrorist Financing (CTF) Policy

Bamba Management AB is a registered manager of **Bamba Capital AB (publ)** and conducts its operations in accordance with the Swedish Act (2017:630) on Measures against Money Laundering and Terrorist Financing.

We have established robust procedures to ensure that all client relationships are built on **transparency, integrity, and full regulatory compliance**. Our framework includes:

- **Customer Due Diligence (KYC):** All investors undergo a thorough verification process through personal meetings and digital systems (Penneo), including identification of beneficial owners and automatic screening against PEP and sanctions lists.
- **Ongoing Monitoring:** All clients are continuously monitored against updated sanctions and PEP registers.
- **Risk Assessment:** Our operations, products, and client base are assessed to carry a **low risk** of money laundering or terrorist financing. The Fund is offered only to professional investors, with long holding periods and limited distribution.
- **Lending Activities:** When loans are issued, full documentation and AML checks are performed in accordance with applicable regulations.
- **Reporting & Compliance Oversight:** The Compliance function is responsible for supervision, ongoing risk monitoring, and reporting of any potential irregularities.

Bamba Management is committed to safeguarding its clients, investors, and the integrity of the financial system by maintaining the highest standards in anti-money laundering and counter-terrorist financing compliance.