



**ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM POLICY**  
**(AML/CFT POLICY)**  
**FOSSAR MARKETS HF.**

**1. General**

- 1.1. Fossar Markets (hereinafter referred to as “Fossar” or “the Company”) is a regulated securities firm under the supervision of the Financial Supervisory Authority of the Central Bank of Iceland (FSA). According to Icelandic law no. 140/2018 and related administrative actions, Fossar is obliged to implement measures to strengthen the Company’s defenses against possible money laundering or terrorist financing.
- 1.2. Fossar has a clear policy on combating money laundering and terrorist financing and to prevent the Company’s operations from being used for such purposes. On the basis of this policy, Fossar has executed a risk assessment of the Company’s operations and set elaborate internal rules which should be followed in every aspect of the Company’s actions. Further details can be found in the abovementioned files.
- 1.3. This policy applies to all employees of Fossar, including the Board of Directors and the CEO, and Fossar’s affiliates and subsidiaries, where applicable.

**2. Objective**

- 2.1. Fossar’s goal is to prevent the Company from being used to aid money laundering or the financing of terrorism, and that its defenses against such activities remain strong. A great emphasis is always placed on following Icelandic law no. 140/2018 and related administrative actions. The Company wants to contribute to the fight against money laundering and terrorist financing.
- 2.2. Fossar strives to keep the risk of money laundering and terrorist financing as low as possible.

**3. Fossar Market’s actions**

- 3.1. To reach its objectives, Fossar has executed a risk assessment on the Company’s operations and set elaborate internal rules, as well as appointing a guarantor for anti-money laundering actions at the Company.
- 3.2. Fossar greatly emphasizes that its employees know their customers and their operations. For that purpose, an applicable due diligence shall be performed for each customer as well as maintaining an active, risk-based monitoring of customers and their transactions.
- 3.3. Appropriate authorities are notified immediately about a suspicion and/or knowledge of money laundering or terrorist financing activities.
- 3.4. Fossar conducts regular training for employees on applicable laws and regulations.

**4. Responsibility**

- 4.1. Fossar has appointed a guarantor for the Company’s actions against money laundering and terrorist financing, but the position is currently held by the Compliance Officer.



## **5. Reviewing and monitoring**

- 5.1. This policy shall be reviewed at least once a year.
- 5.2. This policy, as well as risk assessments and internal rules, are subject to supervision of the guarantor of money laundering and the internal auditor.

Approved by the Board of Directors of Fossar on March 6<sup>th</sup> 2020