



STATEMENT FROM THE VISTRA BOARD OF DIRECTORS

ANTI-FACILITATION OF MONEY LAUNDERING, TERRORISM FINANCING, PROLIFERATION FINANCING AND SANCTIONS BREACHES

Vistra has zero-tolerance for actions and activities that knowingly breach Anti-Money Laundering, Counter-Terrorism Financing, Proliferation Financing and Sanctions orders and regulations.

We recognize the critical importance of preventing money laundering, terrorism financing, proliferation financing and sanctions breaches, not only as a regulatory requirement but as a corporate responsibility. The Vistra Board of Directors and Senior Management are dedicated to implementing robust measures to combat these illicit activities.

We have implemented an Anti-Money Laundering and Counter-Terrorism Financing Policy, Sanctions and Embargoes Policy, Client Risk – Product and Industry Policy, Politically Expose Persons Policy and Country Risk Policy

We have also implemented an Anti-Money Laundering, Counter-Terrorism Financing, Proliferation Financing and Sanction Breaches Prevention Program (AML/CTF Program) comprised of procedures and controls designed to comply with the laws, regulations, and regulatory guidance in the countries in which we operate. The Vistra Board of Directors and Senior Management are accountable for ensuring the effective implementation and operation of our AML/CTF Program. We take this accountability seriously.

Our AML/CTF Program includes procedures and controls to:

- Understand the money laundering, terrorism financing and proliferation financing risks associated with our clients and services
- Know the identity of our clients, associated parties and their owners, as well as the nature of their business with us
- Screen our clients, associated parties and their owners to ensure compliance with international sanctions regimes
- Apply enhanced controls where the money laundering, terrorism financing and proliferation financing risks are higher
- Monitor for suspicious or illicit activity
- Designate of Compliance Officers and Money Laundering Reporting Officers
- Ensure Vistra Staff members receive regular training to help them understand money laundering, terrorism financing, proliferation financing and sanctions risks and their responsibilities in preventing and managing them.
- An independent internal Compliance function to test the program.

As part of Vistra's AML/CFT program, any suspicious activities are reported to law enforcement in accordance with applicable laws.

We are dedicated to continuously improving our AML/CTF Program and policies. This includes staying abreast of regulatory developments, adopting best practices, and enhancing our internal controls and procedures to respond to emerging or changing money laundering, terrorism financing and proliferation financing risks.

This statement was approved by Vistra Parent Limited on 10 December 2024.

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About Vistra

Here at Vistra, **our purpose is progress**. As a close ally to our clients, our role is to remove the friction that comes from the complexity of global business. We partner with companies and private capital managers along the corporate and private capital lifecycle. From HR to tax and from legal entity management to regulatory compliance, we quietly fix the operational and administrative frustrations that hamper business growth. With over 9000 experts in more than 50 markets, we can accelerate progress, improve processes and reduce risk, wherever your ambition takes you.

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