

# Landed Anti-Money Laundering (AML) Policy

Version: 07-11-2025

## 1. Purpose and scope

Landed is committed to maintaining high standards of anti-money laundering (AML) and counter-terrorist financing (CTF) compliance. This policy is designed to protect Landed from being used for illicit financial activities, safeguard its reputation, and ensure compliance with applicable laws and regulations, including those set by the Financial Action Task Force (FATF), European Union directives, and other relevant local and international frameworks.

This policy applies to all users, investors, employees, contractors, consultants, and third parties who engage with Landed in any business capacity.

## 2. Definitions

- **Money laundering:** The process of disguising the origin of illegally obtained funds to make them appear legitimate.
- **Terrorist financing:** Providing financial support to terrorist activities, either directly or indirectly.
- **Customer due diligence (CDD):** Procedures to identify and verify a customer's identity, assess the risk of illegal activity, and monitor transactions.
- **Enhanced due diligence (EDD):** Additional scrutiny applied to high-risk customers, transactions, or jurisdictions.
- **Politically exposed person (PEP):** An individual who holds or has held a prominent public function and may pose a higher risk due to potential involvement in corruption.
- **Suspicious activity report (SAR):** A report submitted to authorities detailing suspicious or unusual transactions that may indicate criminal activity.

## 3. Policy statement

Landed is fully committed to:

- Preventing its platform from being used for money laundering or terrorist financing
- Complying with all relevant AML regulations and industry best practices
- Implementing effective internal controls and procedures to detect, prevent, and report suspicious activity
- Providing regular AML training to ensure staff understand their roles and responsibilities

## 4. Risk-based approach

Landed applies a risk-based approach to AML compliance:

- 1. Risk identification and assessment:** Risks relating to customers, products, services, transactions, and jurisdictions are regularly assessed.
- 2. Risk mitigation:** Appropriate controls are put in place to reduce identified risks, including EDD for higher-risk scenarios.
- 3. Ongoing review:** Risk assessments are updated to reflect changes in business activity, regulation, or customer profiles.

## 5. Customer due diligence (CDD) procedures

Landed distinguishes between identity verification and the declaration of source of funds, based on risk classification and transaction amounts.

### 5.1 Identity verification

All investors must verify their identity before making an investment. Verification is handled by the tools of a third-party provider (Online Payment Platform) and follows a tiered approach:

- **Low-risk investors**
  - Transactions up to € 250, or total lifetime investment under € 1.500
  - Verified via a bank account check (name of investor and bank account name must match)
- **Medium-risk investors**
  - Transactions over € 1.000, or lifetime investment over € 1.500
  - Verified using a passport or national ID card

Once identity verification is complete, Landed automatically screens each investor against PEP and international sanctions lists.

## 5.2 Source of funds declaration

Landed applies a risk-based approach to source of funds declarations, taking into account both the amount invested and the investor's country of residence.

- For investors from high-risk countries (as defined in the attached country list), a post-payment declaration outlining the source of funds is required for investments exceeding € 10.000 (either as a single transaction or cumulatively within a 12-month period).
- For investors from low-risk (safe) countries, this requirement applies only for investments exceeding € 25.000.

In both cases, a clear explanation must be provided, along with supporting documentation (e.g. payslips, bank statements, sale agreements).

To determine whether an investment constitutes a large or unusual amount, Landed also considers the average income levels and local price levels in the investor's country of residence. This ensures a proportional and fair application of due diligence measures.

The classification of countries into low-risk and high-risk is based on internal assessments and is outlined in the country list attached to this policy.

The effectiveness of the Loan Contract is subject to successful completion of the customer due diligence (CDD) process. If the CDD requirements are not fulfilled within the given timeframe, the investment will not proceed, and the funds may be returned.

## 5.3 Fall-back procedures

- If documentation is not provided within 28 days, or before the investment round closes (whichever comes first), funds will be refunded.
- During this period, the related investor funds will be held in a separate account that is not accessible or used by Valvest Finance B.V. until CDD is completed.
- Reminder emails will be sent every two days, including a direct link to submit the required information

## 5.4 Record keeping

- A PDF file containing a full log of the CDD process (with timestamps) is created per investor
- Supporting documents and data from Online Payment Platform (OPP) are securely stored by OPP

## 6. Reporting suspicious activities

- 1. Internal reporting:** Employees must report suspicious activity to the AML Compliance Officer immediately.
- 2. Investigation and documentation:** Reports will be reviewed and documented to determine whether a SAR is required.
- 3. External reporting:** If necessary, SARs will be submitted to the appropriate regulatory authority. Landed will fully cooperate with law enforcement.

## 7. Record keeping

Landed maintains complete records in accordance with legal requirements:

- **Customer identity records:** Retained for at least five years after the end of the business relationship
- **Transaction records:** Including date, amount, and parties involved, kept for a minimum of five years
- **SARs and internal investigations:** Stored securely for a minimum of five years after submission

## 8. Employee training and awareness

All employees receive regular AML training to ensure:

- Awareness of AML regulations and responsibilities
- Understanding of how to identify suspicious activity
- Knowledge of the internal reporting process

Training is delivered annually, with updates provided when regulations or internal procedures change. Attendance and completion are documented.

## 9. Technology and systems

To enhance AML compliance, Landed uses advanced tools:

- **Transaction Monitoring:** Every transaction is manually monitored to ensure accuracy and compliance.
- **Sanctions and PEP screening:** Internally developed tools to automatically cross-check customers against official lists – initiated when making an investment
- **Data analytics:** Used to detect patterns and anomalies that may suggest illicit activity

## 10. Compliance monitoring and internal audit

1. **Ongoing monitoring:** Overseen by the AML Compliance Officer to ensure effectiveness of policies
2. **Internal audit:** Conducted periodically to identify areas for improvement. Audit findings are reported to senior management, with corrective actions taken promptly

## 11. Reporting obligations

Landed meets all statutory reporting duties:

- **Currency transaction reports (CTRs):** Landed does not accept cash payments, hence no CTRs are ever required.
- **Suspicious activity reports (SARs):** Submitted to FIU when there is reasonable suspicion of money laundering or related offences

## 12. Penalties for non-compliance

Failure to comply with this policy may result in disciplinary action, including termination. Landed may also face legal or financial penalties, including fines and regulatory sanctions.

## 13. Confidentiality and data protection

1. **Confidentiality:** All AML-related information is treated as confidential and accessible only to authorised personnel
2. **Data protection:** Customer data is protected using secure systems in line with data protection legislation

## 14. Policy review and updates

This policy will be reviewed at least annually or as required by changes in regulation or business operations. Updates will be communicated to all relevant staff and stakeholders.

## 15. Contact information

For any questions or further information about this AML policy, please contact the AML Compliance Officer at [joep@landed.io](mailto:joep@landed.io).

## **Group A: Low-risk countries**

Threshold for source of funds declaration: € 25.000

- Austria
- Belgium
- Cyprus
- Denmark
- Finland
- France
- Germany
- Greece
- Ireland
- Italy
- Liechtenstein
- Luxembourg
- Netherlands
- Norway
- Poland
- Portugal
- Spain
- Sweden
- Iceland

## **Group B: Higher-risk countries**

Threshold for source of funds declaration: € 10.000

- Bulgaria
- Croatia
- Czech Republic
- Estonia
- Hungary
- Lithuania
- Latvia
- Romania
- Slovakia
- Slovenia
- Malta