

Anti-Money Laundering and Counter-Terrorist Financing Policy

Montecristo Time Global B.V.

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Regulatory framework: Wet ter voorkoming van witwassen en financieren van terrorisme (Wwft)

1. Purpose and Scope

This Policy sets out the framework applied by Montecristo Time Global B.V. (the “Manager”) to prevent money laundering and terrorist financing in accordance with the Wwft and related Dutch and EU regulations. The Policy applies to all services provided in connection with the management of alternative investment funds offered to retail investors with a minimum investment threshold of EUR 100,000.

2. Risk Assessment

The Manager performs and documents a periodic risk assessment covering customer risk, product and transaction risk, delivery channel risk, and geographical risk. The assessment is proportionate to the nature and size of the business and is updated at least annually or upon material changes.

Retail investors, cross-border activities, complex ownership structures, and high-risk jurisdictions are subject to enhanced scrutiny.

3. Customer Due Diligence

Before entering into a business relationship, the Manager conducts Customer Due Diligence including identification and verification of the investor’s identity, identification of Ultimate Beneficial Owners (UBOs) where applicable, and assessment of the purpose and intended nature of the relationship.

CDD measures include:

- Identification and verification using valid government-issued identification.
- Verification of UBOs through reliable and independent sources.
- Screening against sanctions and PEP lists.
- Assessment of source of funds where required.

4. Enhanced Due Diligence

Enhanced Due Diligence is applied in higher-risk situations, including politically exposed persons (PEPs), investors connected to high-risk countries, unusual transaction patterns, or

complex ownership structures. Enhanced measures may include additional documentation, senior management approval, and increased monitoring.

5. Ongoing Monitoring

The Manager continuously monitors investor relationships and transactions to ensure they are consistent with the investor's risk profile. Periodic reviews are conducted based on risk classification. Transaction patterns that appear unusual or inconsistent are reviewed and documented.

6. Reporting of Unusual Transactions

In accordance with the Wwft, the Manager reports without delay any executed or proposed transaction that gives reason to believe it may be linked to money laundering or terrorist financing to FIU-Nederland. Reporting decisions are documented and confidentiality is maintained.

7. Governance and Internal Controls

A designated policymaker is responsible for Wwft compliance. Where proportionate, a compliance function is established to oversee implementation, training, monitoring, and reporting obligations. Employees receive periodic AML/CFT training.

Records of customer due diligence, risk assessments, and transaction reports are retained for at least five years in accordance with statutory requirements.

8. Sanctions Compliance

The Manager ensures compliance with applicable EU and UN sanctions regimes. Clients and UBOs are screened against relevant sanctions lists prior to onboarding and periodically thereafter.