Lion Capital
GmbH · SWITZERLAND

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UID CHE-113.455.534

Confidential — for the addressee only

AML/KYC Policy

Lion Capital GmbH — Anti-Money Laundering and Know Your Customer Policy

Effective date: 15 January 2026 · Switzerland

1. Regulatory Framework

Lion Capital GmbH is authorised by the Swiss Financial Market Supervisory Authority (FINMA) as a portfolio manager (independent asset manager) and is supervised by Swiss Financial Market Supervisory Authority (FINMA).

We comply with the Anti-Money Laundering Act (AMLA) and applicable FINMA regulations.

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2. Know Your Customer (KYC)

Before onboarding, we verify your identity using official documents (passport, national ID, proof of address).

We assess the nature and purpose of the business relationship, source of funds, and expected transaction activity.

KYC information is reviewed periodically and updated when material changes occur.

3. Customer Due Diligence

Standard due diligence: identity verification, address confirmation, screening against sanctions lists.

Enhanced due diligence: applied to high-risk clients (politically exposed persons, clients from high-risk jurisdictions, complex ownership structures). Additional documentation and ongoing monitoring required.

4. Prohibited Activities

We do not accept clients or transactions connected with: money laundering, terrorist financing, fraud, corruption, sanctions evasion, or any other illegal activity.

We reserve the right to refuse or terminate relationships where we have concerns about the legitimacy of funds or the client's activities.

5. Transaction Monitoring

Activity is monitored for unusual patterns or red flags. Suspicious activity is reported to the Money Laundering Reporting Office Switzerland (MROS).

We may request additional documentation to verify the source or purpose of transactions.

6. Record Keeping

KYC records and transaction data are retained for 10 years after the end of the client relationship (legal requirement).

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LION CAPITAL