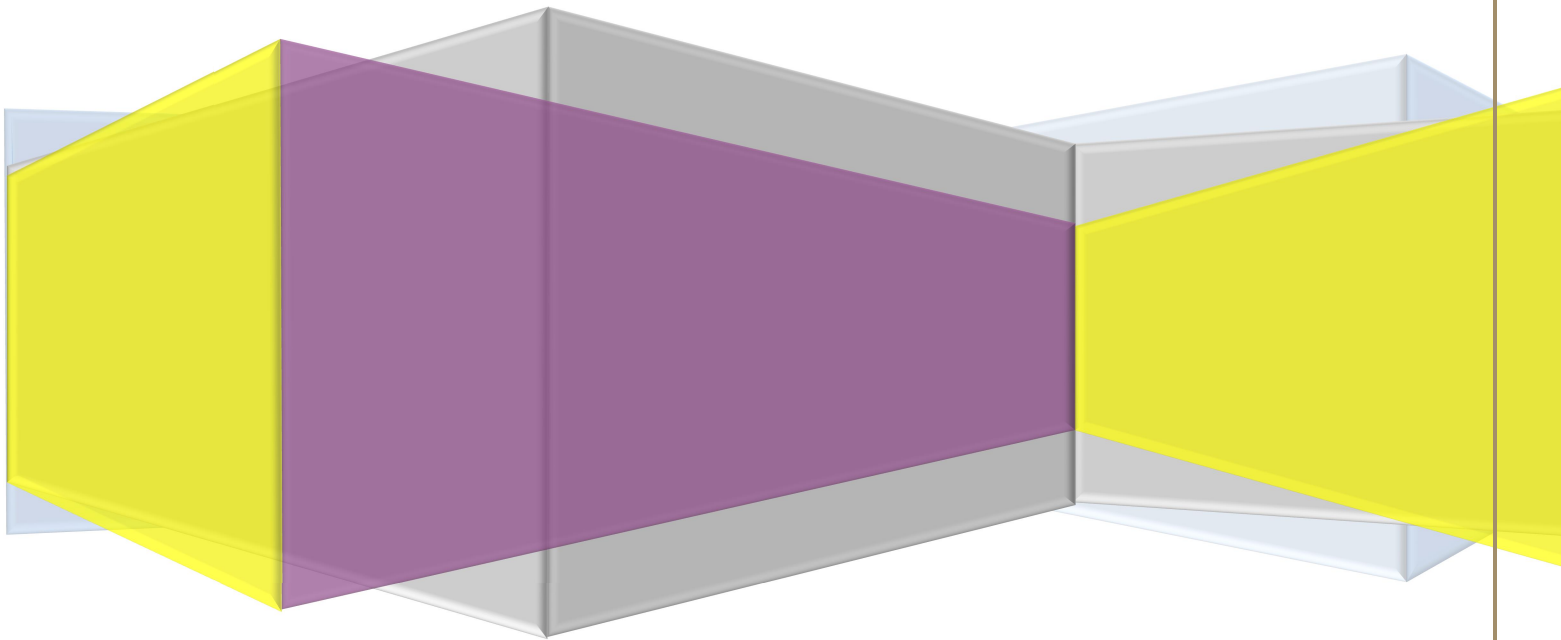


Anti-Money Laundering Statement





Curia Global, Inc. (together with its subsidiaries, “Curia” or the “Company”)

ANTI-MONEY LAUNDERING STATEMENT

Curia is committed to fulfilling its obligations under applicable U.S. and global anti-money laundering laws and regulations (“**AML Laws**”).

Money laundering is the act of concealing the true origins of money or other material values gained from illegal activity (terrorism, drug dealing, illegal arms trade, corruption, human trafficking etc.) by converting it into money or investments that appear to be of legitimate origin.

In the conduct of its business operations worldwide, Curia seeks to prevent any activity that constitutes or facilitates money laundering. To this end, Curia has put in place several measures including, but not limited to, the following:

- 1. Development of an ethical culture including implementation of a Code of Ethics:** The Company has built a strong culture of ethical and responsible conduct across all business operations. Curia’s core values of credibility and integrity have been codified into a Code of Ethics and Business Conduct (the “**Code**”) adopted by the Company. The Code requires unyielding integrity across all business activities, compliance with global trade controls and restrictions, anti-corruption and anti-bribery compliance, fair dealings and due diligence in interactions with business partners, and last, but not the least, accurate recording and reporting of financial information to reflect the true nature of business transactions. Some of these measures are explained in greater detail below.
- 2. Appropriate due diligence on customers and business partners:** Curia has implemented procedures (as appropriate for non-financial and non-designated businesses under applicable AML Laws) to ensure that relevant information regarding the identity of its customers, business partners and/or their beneficial owners is obtained as part of the Company’s regular sales/procurement/business dealings.
- 3. Sanctions Screening and Compliance:** Certain customers and business partners are subjected to enhanced due diligence based on an internal risk assessment process under Curia’s Sanctions Compliance Program (“**SCP**”). The SCP requires that customers, agents and other intermediaries involved in or with countries or regions against which any U.S. sanctions programs are in effect should be subjected to additional screening and due diligence in accordance with Company’s U.S. Sanctions Compliance Policy to ensure that business with such customers does not and will not



violate applicable sanctions laws. Such customers are also required to provide declarations that all funds used for payment to Curia were obtained or transferred in full compliance with U.S. and applicable non-U.S. laws and that in particular, all funds used for payments as well as all financial transactions and/or financial institutions involved in the transaction with Curia, were, and are, in full compliance with any special designations, rules or proposed rules promulgated pursuant to Section 311 of the USA Patriot Act.¹

4. **Internal Financial Controls:** Curia has implemented critical internal financial controls particularly for high-risk transactions such as fund/wire transfers, refunds to customer accounts, cash transactions and use of cash equivalents such as bank checks, traveler's checks or money orders etc.. In the U.S., and in certain other countries where Curia operates, receipts of cash/cash equivalents in excess of \$10,000 (or its equivalent in alternative currency) in the course of trade or business transactions trigger regulatory reporting requirements under AML Laws. Further, when customers request refunds to be made on accounts other than those through which payment was originally received, Curia's finance protocols require investigation and vetting of the new accounts and payment flow to ensure that it is not an attempt to launder money by concealing and confusing the paper trail of funds. Curia's internal controls are therefore designed to detect and flag high risk financial transactions which are then escalated in accordance with an escalation/approval matrix so that any red flags may be identified to, and reviewed by the finance department and senior management (or the Legal and Compliance Department as appropriate), and any corresponding regulatory reporting requirements may be complied with.
5. **Anti-Corruption and Anti-Bribery Guidelines:** Corruption is often a predicate offence that creates proceeds for money laundering. To combat this aspect of the money laundering problem, Curia has implemented a strong policy against the making or receipt of corrupt payments for procuring improper business advantages. The policy is strictly enforced through a number of procedures and requirements including contractual undertakings and assurances in relationships with third party intermediaries, enhanced third party screening and due diligence processes for high-corruption risk countries, anti-corruption training programs as well as compliance audits to monitor the effectiveness of the Company's anti-corruption program.
6. **Hotline and Reporting Mechanisms:** Curia makes available several reporting channels that provide employees the opportunity to report any concerns, suspicious activity or violations concerning the Code, Company policies or prevailing laws and regulations (including AML

¹ Under Section 311 of the USA Patriot Act, the Financial Crimes Enforcement Network (FinCEN) can impose a range of special measures against a foreign (non-US) jurisdiction or foreign financial institution that has been designated as posing primary money laundering concern.



Laws). In particular, a dedicated employee reporting hotline is available 24/7 for employees to report concerns via an anonymous (where permitted by law) or non-anonymous phone or web submission. All reports received through the hotline are reviewed and investigated as appropriate and the Company also has a strong anti-retaliation policy to protect employees who make a good faith report of any known or suspected violations.

It is the responsibility of every employee, director and officer of the Company to strictly adhere to all of the above measures and other relevant Company policies and procedures in order to make a concerted effort to prevent money laundering and ensure compliance with AML Laws.

If you have any questions regarding compliance with AML Laws or Company policies/procedures in that regard, you may reach out to Thomas Randall, the Company's Vice President, Corporate Controller at thomas.randall@amriglobal.com; or the Company's Compliance Officer, Mariesa Coppola at mariesa.coppola@amriglobal.com. Further, employees are encouraged to report any concerns pertaining to specific transactions (including any concerns or suspicions regarding the sources of funds used or the identity of the parties involved in a transaction) directly to the Corporate Controller or the Compliance Officer or through the Employee Reporting Hotline. Curia reiterates its anti-retaliation policy against persons making such reports in good faith.

Issued: June 1, 2021

Revised: August 2021