

Anti-Money Laundering Policy

1. PURPOSE

Birch Ejendomme Holding ApS, Reg. no. 40975292 and all directly and indirectly own subsidiaries ("**Birch Ejendomme**") are committed to preventing money laundering and terrorist financing activities.

As such, Birch Ejendomme have developed and implemented this policy on anti-money laundering and counter terrorist financing ("**AML Policy**") to ensure that Birch Ejendomme mitigate the risk of being misused for money laundering purposes or terrorist financing in all activities in which Birch Ejendomme operate and conduct business.

The AML Policy sets out the overall strategic objectives for Birch Ejendomme's work with preventing money laundering and financing of terrorism. When this Anti-Money Laundering Policy refers to money laundering, such reference shall also include the financing of terrorism, unless the context clearly indicates that the reference applies solely to money laundering.

Birch Ejendomme do not accept any form of money laundering and will refrain from participating in any activity or transaction which exposes Birch Ejendomme to being misused for money laundering purposes. Birch Ejendomme also expect all business partners to have the same attitude towards money laundering.

2. REGULATION

Section 1 of the Danish Anti-Money Laundering Act ("**AML Act**") provides a list of activities subject to the act. Section 1 does not include property transactions or rental activities conducted by Birch Ejendomme. Birch Ejendomme are therefore not subject to the AML Act, which means that Birch Ejendomme are not obliged to observe the preventive measures against money laundering listed in the AML Act, except for the prohibition to (i) receive cash above DKK 15,000 and (ii) use 500-euro banknotes.

3. ACTIVITIES AND MITIGATING MEASURES

Birch Ejendomme recognizes that the industry and certain of the activities carried out by Birch Ejendomme are to some extent exposed to a money laundering risk, for which reason Birch Ejendomme takes preventive measures to mitigate the money laundering risk.

This implies that all employees of Birch Ejendomme should be aware of the risk of being misused for money laundering purposes. Employees must immediately contact the Chief Legal Officer at Birch Ejendomme by any possible means of communication if there are reasonable grounds to believe that activities or transactions are linked to money laundering. The Chief Legal Officer must assess the risk and take appropriate actions to ensure that Birch Ejendomme is not being misused for money laundering.

In addition to the general obligation to stay vigilant towards potential money laundering, Birch Ejendomme has implemented the following mitigating measures for the activities based on the risk assessment of the activities conducted by Birch Ejendomme.

3.1. Property transactions

Within the real estate industry, the risk of money laundering is primarily directed towards illegally obtained funds being invested in real estate. The money laundering risk primarily relates to the buyer as the main risk is that illegally obtained funds enter the legal economy through real estate investments. The ability to identify the real buyer(s) and ascertain whether involvement of third parties or a corporation obscures the owner's identity (without a legitimate business explanation) is central to ascertaining the risk. Contrary, the risk is generally considered low in relation to the seller(s) of property due to the characteristics of the typical sellers.

The risk of terrorist financing differs from money laundering as the funds may originate from legitimate sources but are applied for illegal purposes. Birch Ejendomme are therefore also vigilant about transactions suspected of being used to support terrorist-related activities. The risk of terrorist financing is generally assessed as low in connection with Birch Ejendomme's real estate transactions, as such transactions typically involve professional and well-established business counterparties.

Although Birch Ejendomme are not obliged under the AML Act, Birch Ejendomme have decided to adopt a know-your-customer process in order to ascertain the true identity of each buyer by collecting a KYC form with the following information on the buyer/buyers of a property:

1. An up-to-date organizational chart which contains the entity and all its 10% or more direct and indirect shareholders up to ultimate beneficial owner (UBO) level (with the percentage of shareholding between all entities & intermediaries identified clearly).
2. Full legal name of the members of the executive management and board of directors.
3. Confirmation that no member of the executive management or board of directors nor a UBO is a politically exposed person (PEP) or a relative and close associate (RCA) or information of which specific person is a PEP or an RCA.

Based on the above documentation, Birch Ejendomme conduct a due diligence on prospective buyers to assess the risk of being misused for money laundering. Upon the request of Birch Ejendomme, the requested documentation must be certified by a registered lawyer, chartered accountant, notary or public officials. All certifiers should certify that the documentation is correct and adequate, sign and date the documentation, and provide their contact details.

In addition, Birch Ejendomme shall obtain a declaration from the buyer stating that the funds used or to be used by the buyer(s) in connection with the business transaction with Birch Ejendomme do not originate from proceeds of fraud, corruption, drug trafficking or money laundering, that the funds have been lawfully acquired through legitimate means, and that the funds are not connected to any illegal activities.

Each buyer shall also certify and warrant that neither the buyer, its subsidiaries nor any natural or legal persons that directly or indirectly holds 10% or more of the votes or share capital of the buyer, or that in any other way holds a controlling interest in the buyer are not listed on any Sanctions List and are not otherwise subject to any Sanctions.

"Sanctions" means any economic, trade or financial sanctions, embargos or restrictive measures imposed, administered or enforced by the United Nations, the United States, the European Union and/or its Member States, or any other relevant jurisdiction.

"Sanctions List" means any list of sanctioned individuals, organizations, or entities that has been established,

maintained, or enforced under applicable Sanctions. These include, but are not limited to, lists such as the European Union consolidated list of restricted parties, the United States List of Specially Designated Nationals and Blocked Persons, and any other lists specified by United Nations Security Council Resolutions.

Birch Ejendomme maintain records of these checks for audit and compliance purposes.

3.2. Virtual offices

The provisions in the AML Act require companies to observe the preventive measures if the company offers services to companies by providing a registered office address or other contact address and associated services. A virtual office can be seen as a potential high-risk factor due to the anonymity and limited physical presence it provides.

Birch Ejendomme do not offer virtual offices. Nevertheless, Birch Ejendomme are mindful of situations where entities may use the property in a similar way to a virtual office, and appropriate measures will be taken on a case-by-case basis.

3.3. Cash ban and ban on the use of 500-euro banknotes

Undertakings not subject to the main requirements of the AML Act are subject to a ban on cash transactions. This means that Birch Ejendomme are prohibited from receiving cash payments of DKK 15,000 or more, regardless of whether payment takes place at once or as several payments which appear to be interrelated. In addition, all natural and legal persons in Denmark, including Birch Ejendomme, are covered by a ban on the use of 500-euro banknotes.

To mitigate such risks, Birch Ejendomme do not accept any cash payments.

3.4. Whistleblower scheme

Birch Ejendomme have established a Whistleblower scheme where current and former employees of Birch Ejendomme, business partners, and other external persons associated with Birch Ejendomme can report violations of the law or suspicions thereof, including suspicions of violations of rules on money laundering.

4. **APPROVAL, AUDIT AND CONTACT INFORMATION**

This policy has been approved by the Board of Directors of Birch Ejendomme Holding ApS on 3 December 2025.

Birch Ejendomme's CLO is responsible for continuously reviewing and, if necessary, revising the policy.

Any questions regarding the policy can be sent to Birch Ejendomme's Legal Department at compliance@birchqm.dk.