



Puro.earth Policy

Know Your Business, Know Your Customer, Anti Money Laundering Policies.

Version 1.2 | Approved | 28 April 2026

© Puro.earth Oy 2026. No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form or by any means without full attribution.

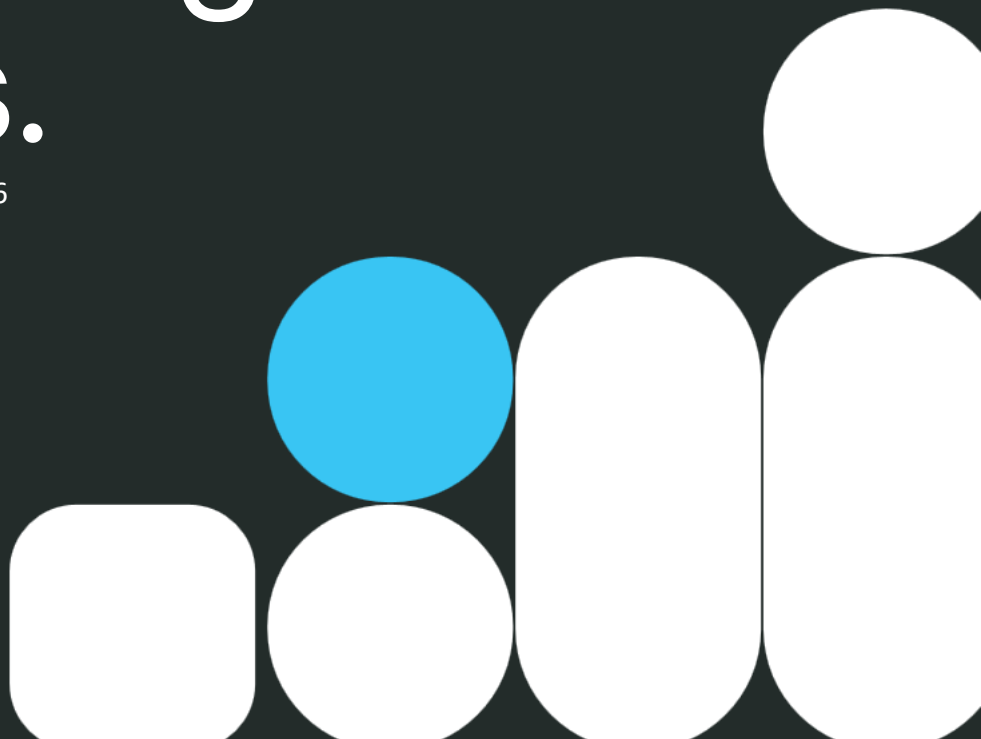


Table of Contents

- 1. Purpose2
- 2. Know Your Business and Anti-Money Laundering2
- 3. Know Your Customer3
- 4. Implementation3
- 5. Review and updates3
- 6. Training 4
- 7. Document History 4

1. Purpose

This document contains the Know Your Business (KYB) and Know Your Customer (KYC) policies for Puro.earth which outline the principles and procedures for verifying the identity and legitimacy of our clients.

Puro.earth may choose to work with an external partner to deliver these services and is responsible for the quality of the process and for the purposes of this document, we use the word Puro.earth even if the checks would be conducted by our subcontractor.

These policies are implemented by the Management Team.

2. Know Your Business and Anti-Money Laundering

Know Your Business (KYB) and Anti-Money Laundering (AML) is the process of verifying the identity and legitimacy of the companies who seek to engage with Puro.earth as partners, suppliers and buyers of CO2 Removal Certificates (CORCs). KYB aims to ensure that Puro.earth only works with companies that have a genuine interest and capability to produce or purchase negative carbon emissions or support in such activity, and that are not involved in any illegal or unethical activities.

Acknowledging the differing levels of risk exposure, Puro.earth applies a simplified KYB process to lower-risk client categories. Such approach is based on the understanding that these entities are subject to statutory reporting, continuous disclosure, and regulatory oversight, with ownership structures that are transparent and verifiable.

Puro.earth reserves the right to escalate any client to the full KYB procedure if risk factors emerge. Escalation may occur when screening indicates elevated money laundering or terrorist financing risks, sanctions exposure, or adverse media, or where ownership and control structures are complex, opaque, or cannot be sufficiently verified.

Puro.earth applies the following KYB procedures to its clients:

- **Registration:** The client must provide information such as the name, registered address, company identification number, and other relevant contact details, as well as the name and email of the person who will act as the authorized representative on behalf of the client.
- **Verification:** The client must provide company-related materials, such as a copy of the company registration certificate, register of shareholders and other relevant documents depending on the level of risk exposure. Puro.earth may also request additional information or documents to verify the nature and scope of the business, such as the annual report, financial statements, environmental impact assessment, or third-party certifications.
- **Screening:** The client must undergo a screening process to check whether it is subject to any sanctions, restrictions, or adverse media coverage that may affect its eligibility or suitability to join the Puro.earth ecosystem. Puro.earth may use external sources or databases to conduct the screening, such as the European Union's sanctions list, the United Nations' consolidated list, or the World-Check database.

- **Approval:** The client must receive formal approval from Puro.earth before it can start issuing and managing CORCs on the platform. Puro.earth reserves the right to reject any application that does not meet its KYB criteria or standards, or that poses a potential risk to its reputation or operations.
- **Monitoring:** Puro monitors the organizations that have gone through the KYB process to ensure they are not entered to global sanctions lists and that their representatives are not on Politically Exposed Person (PEP) screening lists. If such event occurs, a representative of Puro will reach out to the organization and initiate contract termination procedure.

Puro.earth also requires its clients to promptly notify of any changes or updates in their information or status that may affect their eligibility or suitability to join or remain on the platform.

3. Know Your Customer

Know Your Customer (KYC) is the process of verifying the identity and legitimacy of the individuals who act as the representatives or agents of the companies who seek to join Puro.earth framework as partners, suppliers and buyers of CO2 Removal Certificates (CORCs). KYC aims to ensure that Puro.earth only works with individuals who have the proper authorization and capacity to act on behalf of their company, and that are not involved in any illegal or unethical activities.

Acknowledging the differing levels of risk exposure, Puro.earth has opted to omit requirement of KYC for lower-risk client categories. However, Puro.earth reserves the right to escalate any client to the full KYC procedure if risk factors emerge. Escalation may occur when screening indicates elevated money laundering or terrorist financing risks, sanctions exposure, or adverse media, or where ownership and control structures are complex, opaque, or cannot be sufficiently verified.

As part of its KYC process, Puro.earth conducts an identification procedure that requires its clients providing details such as the name, email address, position of the individual designated as the client's authorized representative, as well as proof of the individual's authorized signatory rights.

Puro.earth also requires its clients to promptly notify of any changes or updates in their information or status that may affect their eligibility or suitability to join or remain on the platform.

4. Implementation

Puro.earth continuously monitors the status of Account Holders on the Puro.earth platform. Puro.earth may suspend or terminate the account of any client that fails to comply with its KYB and KYC policy and procedures, or that provides false, misleading, or fraudulent information or documents.

5. Review and updates

Puro.earth monitors and reviews its KYB and KYC policy and procedures at least biannually to ensure that they are effective, efficient, and compliant with the applicable laws and regulations. In the interim, Puro.earth may update or amend its KYB and KYC

policy and procedures at any time and will notify its clients of any changes or requirements.

6. Training

Puro.earth is committed to providing adequate and appropriate training for all relevant people in the organization on its KYB and KYC policy and procedures. The Management Team ensures that the training ensures compliance and understanding of the purpose, scope, and implementation of the policies, as well as the roles and responsibilities of the staff involved. The training also covers the legal and regulatory framework governing the KYB and KYC requirements, the risks and consequences of non-compliance, and the best practices and standards for conducting due diligence and verification checks.

The training is tailored to the different levels and functions of the staff, depending on their exposure and involvement in the KYB and KYC process. For example, the frontline staff who interact directly with clients, such as the sales and marketing team, are required to undergo more in-depth and frequent training, as they are responsible for collecting and verifying the information and documents from clients. They are also trained on how to identify and report any suspicious or unusual activities or transactions that may indicate fraud, money laundering, or other criminal activities.

7. Document History

Version	Issue Date	Comment
V 1.0	25 March 2024	Initial version published
V 1.1	17 September 2025	Refinement of procedures, including introduction of a risk exposure-based verification approach and updates to verification requirements, with minor structural and wording improvements throughout
V 1.2	28 April 2026	Update to responsible party for policy management



puro earth

contact@puro.earth

www.puro.earth

Puro.earth is the world's leading market infrastructure provider for engineered carbon dioxide removal (CDR). We provide the certification frameworks, scientific standards, and digital systems that allow engineered CDR to scale as an investment-grade market.

At the core of this infrastructure is the Puro Standard - the world's first dedicated standard built for the needs of an engineered CDR market. We certify suppliers under the Puro Standard that durably store carbon dioxide for at least 100 years, and in many cases over 1,000 years. To date, we have certified over 100 engineered CDR projects, resulting in the issuance of over 1.5 million CO₂ Removal Certificates (CORCs) in the Puro Registry as verified, traceable, investable assets. Our infrastructure is trusted by over 700 companies worldwide to procure carbon removals with confidence.

Nasdaq has owned a majority stake in Puro.earth since 2021. This brings 50+ years of expertise in building and operating the world's most trusted markets, strengthening Puro.earth's ability to deliver the transparency, rigor, and operational capacity needed to make CDR an institutional-grade asset class.

Puro.earth is an ICVCM Eligible Carbon Crediting Programme.