



# **ANTI-MONEY LAUNDERING AND TERRORIST FUNDING REGIME**

*Adopted by the Board of Directors on August 18, 2023*

## **INTRODUCTION**

This Anti-Money Laundering and Terrorist Financing Policy sets out Pulsar Helium Inc. and its subsidiaries (collectively, the “**Company**”) commitment to adhering to Canada’s Proceeds of Crime (Money Laundering) and Terrorist Financing Act (S.C. 2000, c.17) (the “**Act**”).

Money laundering is the process of concealing the criminal origin of money or other assets (such as raw materials), so they appear to come from a legitimate source. It is illegal, unethical and facilitates criminal conduct. The Act enhances Canada’s capacity to take targeted measures to protect its financial system and to facilitate Canada’s efforts to mitigate the risk that its financial system could be used as a vehicle for money laundering and the financing of terrorist activities.

Failure to address the risk of money laundering could undermine our reputation and lead to investigations, fines and/or other penalties for the company and/or individuals.

## **WHO DOES THIS APPLY TO?**

This policy applies to all employees, directors and officers, as well as contractors under the Company’s direct supervision, working for a Company office or industrial asset directly or indirectly controlled or operated by the Company worldwide.

We assert our influence over contractors we don’t control or operate to encourage them to act in a manner consistent with the intent of this policy.

## **WHAT IS OUR COMMITMENT?**

We are aware of the risk of third parties exploiting us to engage in money laundering.

We do not assist, support, participate in or permit money laundering or terrorist financing.

We do not accept money or other assets if we know or suspect that they derive from any kind of criminal activity. We do not knowingly deal with criminals, suspected criminals or the proceeds of crime.

We do not facilitate the acquisition, ownership or control of criminal proceeds or other assets deriving from criminal activity nor do we assist others in concealing criminal proceeds or assets.

We do not tolerate tax evasion of any kind and we do not knowingly or willfully facilitate tax evasion. We implement procedures to prevent the facilitation of tax evasion by our people and others acting on our behalf.

To manage our money laundering risk exposure and ensure compliance, we implement a number of controls and processes. These include:



- conducting know your counterparty and due diligence procedures in order to determine the background and identity of our counterparties; and
- implementing controls in respect of payments we make and receive using a risk-based approach to ensure that they are consistent with the requirements of this policy. For example, as a general rule, we make all payments under our contracts to, and receive payments from, our contractual counterparties to avoid the risk of facilitating money laundering or tax evasion.

We require employees to be alert to any unusual or suspicious arrangements which could expose us to the risk of money laundering or the facilitation of tax evasion, and to report such arrangements to the Chief Executive Officer.

### **SPEAKING OPENLY**

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of the Code of Conduct and Ethics and this policy with their manager, supervisor or via other available reporting channels. Our Whistleblower email – [whistleblower@pulsarhelium.com](mailto:whistleblower@pulsarhelium.com) - is available to employees, contractors and external parties. The Company takes concerns seriously and handles them promptly.

The Company has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct and Ethics and policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.

### **CONSEQUENCES**

Our policies support our values and Code of Conduct and Ethics and reflect what is important to us. The Company takes breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

### **KEY TERMS – MONEY LAUNDERING**

The process of concealing the criminal origin of money or other assets (such as raw materials), so they appear to come from a legitimate source. Money laundering can take many forms and involve many types of assets, including commodities. While money laundering is usually associated with drug trafficking or organized crime, it may arise in connection with any profit-generating crime including bribery, embezzlement, corruption, extortion, human trafficking, fraud and tax fraud. Money laundering can also be used for the purposes of terrorist financing. In many jurisdictions, one does not need actual intent to commit a money laundering offence. One can commit the offence simply by negligently failing to have knowledge of the criminal origin of the money or assets received when this should have been known.