# **bitf bitfarms** ANTI-MONEY LAUNDERING POLICY

## 1. Introduction

Bitfarms Ltd., its subsidiaries, and affiliated companies (hereinafter jointly referred to as "**Bitfarms**" or the "**Corporation**"), is committed to maintaining the highest standards of integrity and accountability in its business affairs while seeking to grow its business and enhance shareholder value. The guidelines and principles governing Bitfarms' business conduct are set out in the Code of Business Conduct and Ethics (the "Code") available at <u>www.bitfarms.com</u>.

This Anti-Money Laundering ("AML") Policy (the "**Policy**") establishes Bitfarms' commitment to preventing, detecting, and reporting money laundering activities in compliance with all applicable laws and regulations.

It is Bitfarms' policy to seek to ensure compliance with all applicable legal and regulatory requirements relating to Bitfarms' business in all material respects. Bitfarms expects all directors, officers, employees, consultants and contractors (collectively, the "**Representatives**"). to participate actively in maintaining this standard.

## 2. Objectives of the Policy (Scope)

The purpose of this Policy is to:

- Establish guidelines for compliance with AML laws and regulations.
- Minimize the risk of Bitfarms' involvement in money laundering activities.
- Provide a framework for detecting and reporting suspicious activities.
- Protect Bitfarms' reputation and integrity.

## 3. Definitions

- **Money Laundering**: The process of concealing the origin, ownership, or destination of illegally or suspiciously obtained money by hiding it within legitimate economic activities to make it appear legal.
- **Suspicious Activity**: Any activity or transaction that seems unusual or inconsistent with a customer's known legitimate business or personal activities.

## 4. Policy Statement

Bitfarms is committed to:

- Complying with all applicable AML laws and regulations in our operating jurisdictions.
- Implementing and maintaining effective internal controls to prevent money laundering.
- Conducting risk assessments to identify potential money laundering risks.
- Performing due diligence on business partners, and transactions.
- Reporting suspicious activities to the appropriate authorities.

## 5. Responsibilities

The Board of Directors and Representatives are responsible for:

- Oversee the implementation and effectiveness of this Policy
- Ensure adequate resources are allocated for AML compliance
- Foster a culture of compliance throughout the organization.

All Representatives shall:

- Adhere to this Policy and related procedures.
- Report suspicious activities promptly.

Bitfarms shall conduct regular risk assessments to identify potential money laundering risks in its operations. Based on these assessments, appropriate due diligence measures shall be implemented.

This Policy applies to all Representatives of the Corporation, and receipt by a Representative of the latest version of this Policy will be deemed to constitute such Representative's acceptance and agreement to be bound by its terms.

# 6. Compliance and Reporting

Representatives are required to take all reasonable steps to prevent violations of this Policy, identify and raise potential issues as soon as reasonably practicable, and to seek additional guidance when necessary. For questions about this Policy, contact <a href="mailto:legal@bitfarms.com">legal@bitfarms.com</a>.

Suspected violations of this Policy may be reported through the Corporation's independent whistleblower platform at <u>http://bitfarms.ethicspoint.com</u> or <u>http://bitfarmsmobile.ethicspoint.com</u> / or by telephone at:

- 1-844-992-4862 (toll-free, within the United States, Guam, Puerto Rico and Canada).
- 008-11-800 then dial 844-486-1618 (from Paraguay)
- 0-800-222-1288 then dial 1-844-486-1618 (from Argentina).
- These reporting channels are accessible 24 hours a day, 7 days a week.

All Representatives must comply with the laws, regulations, and rules of the jurisdiction where they carry out their business duties and where the Corporation conducts its business activities, particularly regarding corrupt practices laws. Where uncertainty exists, competent legal advice should be obtained.

# 7. Reporting Violations

Any person who becomes aware of actions that violate this Policy must report it to their immediate supervisor. However, if uncomfortable discussing the matter with their supervisor, or if they believe the supervisor hasn't dealt with the matter properly, they should raise the matter in accordance with the Corporation's Whistleblower Policy using the reporting channels mentioned above. Representatives who raise concerns in good faith will not face disciplinary action.

# 8. Consequences of Policy Violation

Proven violations of this Policy may lead to disciplinary action, including termination of employment or consulting arrangements with cause and without notice. Violations may also breach certain laws, potentially resulting in referral to appropriate authorities, which could lead to penalties, fines or imprisonment.

# 9. Annual Certification

All Representatives., shall provide annual certification of compliance with this Policy in the form attached to Bitfarms' Code of Business Conduct and Ethics.

The Chief Executing Officer and Corporate Secretary of Bitfarms shall be responsible for ensuring that annual certifications are obtained on or before the end of the second fiscal quarter of each year for all directors, officers, specified employees, specified consultants and specified contractors and for providing written confirmation to the Board of Directors that such certifications have been obtained and summarizing the results thereof.

## 10. Review of this Policy

The Board shall review and evaluate this Policy annually, generally on an annual basis to determine its effectiveness in ensuring Bitfarms compliance with applicable laws and to ensure that the Corporation's business and affairs are conducted with honesty, integrity and in accordance with the highest ethical and legal standards.

Dated:

Approved by:

March 7, 2025 Board of Directors