

Tencent Anti-Money Laundering Policy Statement

Tencent Holdings Limited and its subsidiaries (collectively “Tencent Group”) are committed to complying with all applicable laws and regulations that are binding on Tencent Group in the jurisdictions in which we operate, including laws relating to money laundering and terrorism financing.

Tencent Group has therefore established a risk-based anti-money laundering (“AML”) policy and Counter Terrorism Financing Program (“AML Program”). The objective of the AML Program is to ensure that money laundering and terrorism financing risks identified by Tencent Group are appropriately addressed and mitigated. This is achieved by establishing policies at a Group level that define the minimum standards, governing policies, principles, and controls which Tencent Group must comply with. The aim of our AML Program is to offer comprehensive protection to Tencent Group, its employees; shareholders and customers from money laundering.

The AML Program includes but is not limited to

- Written policies, procedures and system of internal controls designed to facilitate ongoing compliance with applicable AML laws and regulations;
- A customer due diligence program, which incorporates customer identification and verification, know your customer principles;
- AML risk assessment policy and enhanced due diligence on customers assessed as higher risk, including PEPs and their relatives and close associates;
- Monitoring and reporting of suspicious activity to appropriated regulatory authorities;
- Mandated regular independent testing and regular AML training for appropriate personnel;
- Record keeping requirement in accordance with applicable laws and regulations in the jurisdictions;

Tencent Group may revise its AML policy from time to time as and when necessary to ensure Tencent internal compliance measures remain current and effective. Tencent will continually develop principles and controls to ensure we combat money laundering and terrorist financing in accordance with appropriate industry standards.