

POLICY ANTI MONEY LAUNDRING AND COUNTER TERRORISM FINANCING



22/12/2025 - *Internal Audit*

1. PREMISE

This Corporate Policy on Anti-Money Laundering and Counter-Terrorism Financing aims to define the principles and guidelines adopted by SACMI Group to prevent and fight money laundering and terrorism financing, in compliance with applicable laws and regulations.

2. PRINCIPLES

With regard to the fight against money laundering and terrorism financing, SACMI Group undertakes to:

- **Comply** with applicable laws and regulations;
- **Adopt** appropriate organizational, management, and control measures;
- **Promote** a corporate culture based on awareness of related risks;
- **Train** its personnel;
- **Cooperate** with competent authorities in case of suspected money laundering or terrorism financing operations.

3. ORGANIZATIONAL, MANAGEMENT, AND CONTROL MEASURES

SACMI Group adopts the following organizational, management, and control measures:

- **Counterparty Identification:** When establishing a new business relationship, SACMI Group identifies counterparties by requesting appropriate documentation for this purpose.
- **Counterparty Monitoring:** SACMI Group periodically monitors the evolution of counterparties by analyzing changes in their corporate profile, activities, and significant operations carried out.
- **Reporting Suspicious Transactions:** SACMI Group reports identified suspicious transactions to the competent authorities.

4. TRAINING

SACMI Group provides training to its personnel on anti-money laundering and terrorism financing. Training includes information on the risks of money laundering and terrorism financing, the measures adopted by SACMI Group to prevent them, and the procedures to follow in case of suspected operations.

5. COOPERATION WITH COMPETENT AUTHORITIES

SACMI Group cooperates with competent authorities in case of suspected money laundering or terrorism financing operations. Cooperation includes reporting suspicious transactions to the competent bodies and providing information and documents.

6. PUBLISHING AND REVIEW

This Policy is published on the corporate intranet (Digital Hub) and is subject to periodic review to ensure compliance with changes in laws and regulations on anti-money laundering and terrorism financing.

7. CONTACTS

For any questions or clarifications regarding this policy, employees are invited to contact sostenibilita@sacmigroup.com
