

SONAE CAPITAL

**MONEY LAUNDERING AND
TERRORIST FINANCING
PREVENTION POLICY**



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Sonae Capital position:

This policy reflects the definition of the basic principles – to be applied transversally in the Group headed by Sonae Capital in what regards the prevention, detection and response to the risks of exposure to transactions with third parties, the purpose of which (transactions) is converting resources from a criminal source into lawful resources through mechanisms of money laundering (ML), financing terrorist organizations or contributing to the proliferation of weapons of mass destruction (TF). This policy was prepared in accordance with the applicable Law, namely Law 83/2017 of 18 August and shall be applied without exception to all employees of Sonae Capital and its subsidiaries.

Within the framework of this policy, Sonae Capital is committed to:

- Conduct a preliminary analysis to its counterparts that allows it to initiate/maintain commercial/institutional relations solely with entities that, according to its best knowledge, pursue legitimate activities, whose sources of income are lawful and that do not represent a high risk of direct or indirect involvement in ML/TF practices;
- Comply with the applicable legislation on ML/TF prevention in the geographies where it operates directly or indirectly;
- Set out appropriate control mechanisms, with differentiated applicability according to the risk that the counterparties/transactions represent to Sonae Capital, and aiming to promote (i) the early identification of ML and TF operations and (ii) the prevention of ML/TF related sanctions' violations, as issued by a competent international authority;
- Encourage reporting by its personnel via open talk channel or otherwise, of circumstances which may be considered related with ML/TF;
- Promote the training of people whose functions are relevant to prevent, detect or respond to ML/TF risks, taking into account, amongst other factors, their degree of risk exposure.

Final statement:

Within the purpose of this policy and, with a view to ensure continuous improvement, Sonae Capital is committed to monitor the evolution of best practices as regards the prevention of ML and TF risks.

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