



POLICY ON MONEY  
LAUNDERING PREVENTION  
AND FINANCING OF  
TERRORISM



# INDEX

1	INTRODUCTION .....	3
2	SCOPE OF APPLICATION.....	3
3	DEFINITION OF MONEY LAUNDERING AND FINANCING OF TERRORISM.....	4
4	IDENTIFICATION AND KNOWLEDGE OF THIRD PARTIES .....	5
5	COMPLIANCE WITH THE POLICY .....	5
6	QUERIES AND COMPLAINTS .....	6
7	APPROVAL AND OPERATION OF THE POLICY .....	7



## 1 INTRODUCTION

Grupo IGNIS (or the “Company”) undertakes to carry out all aspects of its activity fulfilling the highest legal and ethical standards. To this end the Company has implemented this Policy on Money Laundering Prevention and Financing of Terrorism (hereinafter the “Policy”) as way to prevent any activity for money laundering and/or financing of terrorism, avoid irregular conducts and allow Grupo IGNIS to respond swiftly and efficiently to any information requested about its behaviour.

This Policy is conceived on the grounds of the mission, vision and values of the Company and aligns with the rest of policies and internal codes of Grupo IGNIS.

All employees, managers, directors of Grupo IGNIS or anyone acting in its name and in general, any member of Grupo IGNIS (hereinafter, the “Employees” or in singular the “Employee”) will adhere to the Policy and all other policies and internal codes previously approved by the Company for the sake of avoiding and detecting the commission of any unlawful act.

Grupo IGNIS shall make available for all Employees this Policy which shall be subject to the necessary actions for its communication, implementation, training and awareness.

## 2 SCOPE OF APPLICATION

The Policy is addressed to Employees who exercise their activities regardless of their type of contract defining their professional and/or employment relationship or of the place where they carry out such activity.

Compliance with this Policy is mandatory for all Employees and its observance does not exempt from the fulfilment of all other standards to be applied pursuant to the current legislation of the areas where Grupo IGNIS operates.

Provisions contained in this Policy and in other Group policies are subject to the regulations governing each country. Should there be any discrepancy between this Policy and other Group policies and the regulations governing each area the issue shall be referred to the Compliance Officer of Grupo IGNIS.



### 3 DEFINITION OF MONEY LAUNDERING AND FINANCING OF TERRORISM

For the purposes of this Policy, it is understood as:

- *Money Laundering:*
  - The conversion or transfer of goods knowing that the origin of such goods is a criminal activity or the participation in a criminal activity in order to hide or conceal the criminal origin of the goods and help people considered involved in evading the legal consequences of their acts.
  - The concealment or disguise of the nature, origin, localization, disposition, movement or beneficial owner of the goods or rights over goods knowing that such goods come from a criminal activity or the participation in a criminal activity.
  - The acquisition, possession or use of goods knowing at the time of their reception, that they come from a criminal activity or from the participation in a criminal activity.
  - The participation in any of the activities mentioned in the sections above, the association to commit this kind of acts, the attempt to commit it and the fact of helping, encouraging or advising someone to carry them out or ease their execution.

It shall be considered as money laundering even when the activities origin of the goods, have taken place in the territory of another State.

- *Financing of terrorism*
  - The supply, deposit, distribution or collection of funds by any means either directly or indirectly with the intention of using them or knowing that they will be used fully or in part for the commission of any of the terrorist offences.

It shall be considered financing of terrorism even when the supply or collection of funds or goods has developed within the Spanish territory.



## 4 IDENTIFICATION AND KNOWLEDGE OF THIRD PARTIES

Employees within the framework of the employment, professional and commercial relations shall identify and know the third parties with whom Grupo IGNIS holds relationships in the exercise of their activities and, if applicable, their beneficial owner, pursuant to the due diligence measures established in the internal regulation and if applicable, any legislation applicable refraining from entering into commercial relations when such identification and knowledge has not been possible. Also, they shall verify that such third parties are not subject to any international sanctions for commercial relations.

Grupo IGNIS shall store in its records all information on third parties with whom Grupo IGNIS holds relations in the exercise of its activities necessary for the fulfilment of the legal requirements applicable to each jurisdiction on anti-money laundering and financing of terrorism. The minimum period of conservation will be of ten (10) years and shall be subject to the terms envisaged in the current legislation.

## 5 COMPLIANCE WITH THE POLICY

Employees in the development of their duties shall strive to act according to the law but also to do so according the social corporate responsibility of Grupo IGNIS in order to guarantee that the principles and standards included in this Policy govern the normal operation of the Company.

The Company shall implement all resources necessary for everyone to whom this Policy applies, acts always honourably assuming the following responsibilities:

- Reading, knowing and understanding this Policy as well as the rest of policies, principles and procedures of Grupo IGNIS aimed at developing their commitments in order to guarantee their adherence to all requirements.
- Meeting each of the aspects mentioned in the Policy and in other codes, policies, principles and procedures of Grupo IGNIS.
- Ensure that Business partners and other collaborators affected by this Policy and other codes, policies, principles and procedures of Grupo IGNIS undertake and fulfil the Code of Conduct for Suppliers.



- Demonstrating in day to day activities the commitment with the principles of the Policy and other policies and procedures of Grupo IGNIS as well as setting an example for the rest of collaborators.
- Avoiding any situation which may give rise to illegal practices or inconsistent with the basic principles of action contained in this Policy.
- Collaborating with compliance and audit bodies providing the information requested and being faithful to reality.
- Checking with the Compliance Officer and the Sustainability Area in case of doubts with respect to the actions to be taken pursuant to the provisions of this Policy and other policies, principles and procedures of Grupo IGNIS.
- Communicating any incidence arising from the knowledge or suspicion of breach of this Policy and other policies, principles and procedures of Grupo IGNIS using the Consultations and Complaints Channel.

The breach of the provisions in the Policy may be the object of legal actions. In the event of breach of the provisions of the Policy, the Company and its Employees shall react immediately subject to the framework allowed by the regulation to be applied, implementing all legitimate measures applicable.

The response will be consistent with the seriousness of the facts regardless of the hierarchy of the people involved.

## 6 QUERIES AND COMPLAINTS

Grupo IGNIS makes available for all Employees as well as for third parties the Internal Information System (hereinafter the “Whistleblowing Channel”) for any party interested in reporting incidents, queries, doubts or complaints regarding the breach of the commitments of this Policy as well as all other internal and external regulations applicable.

The Whistleblowing Channel is available on Grupo IGNIS corporate website for its use by all those Employees and third parties that require it.

Any Employee who is aware or has reasons to strongly suspect of a breach of this Policy or of conducts or acts contrary to the legal system shall contact through the Whistleblowing Channel with the Compliance Officer immediately.



The Whistleblowing Channel of Grupo IGNIS fulfils all demands and guarantees provided for Law 2/2023 of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, guaranteeing:

- Confidentiality of information.
- Lack of retaliation against the informant.
- Integrity of the traceability and management of complaints and/or queries made in good faith.

The *Compliance Officer* shall initiate an investigation in case of detection of signs of an irregularity provided for in the Policy and/or in the applicable legislation and shall notify the beginning of such investigation to the informant and if applicable, the person denounced.

## 7 APPROVAL AND OPERATION OF THE POLICY

This Policy is an adaptation of the Code approved on 12 November 2021 which it supersedes and has been approved by the Board of Directors of Grupo IGNIS on July 6<sup>th</sup>, 2023.

Since its approval the Policy is included in the regulations of Grupo IGNIS being in force until its annulment, revoke or update.

The Policy is subject to periodical revision and update processes in order to adjust it to the applicable regulations from time to time, to the social and professional reality and context of the Company.

In the event of any update of the Policy the interested parties will be timely informed using the communication mechanisms provided for by Grupo IGNIS.