

ANTI-MONEY LAUNDERING POLICY



KEY POINTS TO REMEMBER

- Payments by a third party to Logoplaste must be made in the form of a check (regular or cashier), wire transfer or bank draft.
- Payments to vendors should be made either in the form of a bank transfer to the vendor's bank account in the country where the vendor is located or the services are performed or by check sent to the vendor's business address.
- Monetary transactions should only be conducted directly with the contracted business partner, in accordance with agreed upon payment terms.



POLICY STATEMENT

- Logoplaste's fundamental values - Partnership, Teamwork, Quality, Integrity, Innovation, and Safety – Money Laundering and tax evasion are serious threats to the legal economy and affect the integrity of corporations. The objective of criminals is to disguise the source of the money and make it difficult to retrace its origins.
- Violation of applicable tax, fiscal or trading laws, even if unintentional, may result in civil (e.g., monetary fines) and criminal penalties. Even investigations into suspected violations of these laws can result in negative publicity, damage Logoplaste's reputation and other adverse consequence.



PURPOSE

- The purpose of this policy is to establish the general framework for the fight against money laundering for Logoplaste Group.



SCOPE

- All Logoplaste employees are required to read and comply with this Policy.



DEFINITIONS

- **Money Laundering:** the process by which criminals attempt to conceal the true origin and ownership of the proceeds of criminal activities. Money Laundering exists where third parties use the proceeds of crime to pay for goods or services. Criminals do this by disguising the sources, or moving funds to a place where they are less likely to attract attention
- **Company or Logoplaste:** Mar Bidco, Sàrl and its direct and indirect subsidiaries.



STATEMENTS & GUIDING PRINCIPLES

Logoplaste will not tolerate, facilitate, or support illegal activities involving the use of our Company products as a vehicle for tax evasion or Money Laundering. For this reason, Logoplaste has implemented business systems in order to ensure that we do what we reasonably can, as a responsible company, to prevent our products from being used to "launder" or disguise the proceeds of crime.

The practices Logoplaste has established are designed to prevent us from unknowingly becoming part of a money laundering chain or a tax evasion scheme.

ANTI-MONEY LAUNDERING

Persons involved in criminal activities, such as terrorism, narcotics or corruption, may attempt to "launder" the profits of their crimes, by hiding them or making them be seen as legitimate. Most of the countries in which we operate strictly prohibit money laundering and consider it a criminal offense. Logoplaste is highly committed to comply with applicable laws, rules and regulations in relation to money laundering.

Money laundering is not always easy to identify. Employees must be diligent when dealing with situations / third parties that potentially could be related to money laundering activities.

Therefore, this Policy establishes that Logoplaste's employees must:

- Immediately notify to the Global Compliance Officer if they have any suspicion about actual or potential money laundering activity or through the Whistleblowing hotline channel;
- Look out for warning signs of money laundering, such as when suppliers / customers request to:
 - Pay / receive funds to / in a bank account in the name of a third party or overseas;
 - Pay / receive funds in a form outside the normal terms of business, especially cash;
 - Split / request payments into several payments / bank accounts; or
 - Overpayments

Employees involved in engaging or contracting with third parties such as new suppliers, customers and distributors must:

- Ensure that a proper analysis (3rd party screening) has been conducted prior to the transaction contract signature / transactions and if any issue arises, report to the right employees within Logoplaste;
- Keep appropriate records of the business history;
- Contact the Global Compliance Officer when evaluating these parties.

LOGOPLASTE MANDATORY PRACTICES

RECEIVING PAYMENTS

Payments to Logoplaste or a Logoplaste affiliate from a third party must be made in one of the following forms:

- a check drawn on a bank account in the name of the individual or entity who owes the money to Logoplaste or its affiliate;
- a wire transfer from a bank account in the name of the individual or entity who owes the money to Logoplaste or its affiliate;
- a cashier's check issued by a bank in the country where the individual or entity who owes Logoplaste or its affiliate the money has its business; or
- a bank draft issued by a bank in the country where the individual or entity who owes Logoplaste or its affiliate the money has its business.

In addition, payments must be made in a single form of payment that is for the exact amount in the invoiced currency.

No employee should accept the following forms of payment:

- payments in cash;
- third party payments, i.e. payments made by individuals or entities other than the individual or entity that owes Logoplaste or its affiliate the money;
- overpayments;
- payments in currencies other than the invoiced currency;
- mixed payments (e.g., check and wire transfer for one single invoice); and
- multiple payment (e.g., using several checks or wire transfers to settle a single invoice. Except when a client has a cap on the amount of wire transfers and makes several transfers from the same bank account).

If one of these situations occurs, the full amount paid should be returned (in the same currency as received) to the individual or entity that made the payment

MAKING PAYMENTS

Payments to vendors should be made to the vendor's bank account in the country where the vendor is located or where the services are performed. Exception: international payments are allowed within the SEPA area.

Payments may be made by check payable or bank transfers to the vendor and should be sent to the vendor's business address.

Logoplaste affiliates are authorized to make low value petty cash payments up to 500 USD or equivalent.

No payments shall be made to non-contracted third parties, including persons affiliated with vendors.

EXCEPTION HANDLING

Requests for exceptions must be submitted in writing to the Chief Financial Officer and the Global Compliance Officer. Exceptions are jointly approved by the Chief Financial Officer and the Global Compliance Officer.



TRAINING

Logoplaste has developed a specific training plan for all its managers and employees regarding money laundering.

The Compliance Officer is responsible for designing training and monitoring compliance with the Logoplaste's training requirements. Records of all training activities provided under this Policy (including the list of participants and dates) must be kept.

For more information on applicable training, contact your Global Compliance Officer (compliance@logoplaste.com).



RELATED POLICIES OR GUIDELINES

- Code of Conduct
- Anti-Bribery, Anti-Corruption Policy

Gerardo Chiaia
Logoplaste Chief Executive Officer



Reviewed 31st August 2023 (V3)
The next review is planned for 2024,
sooner if the need arises