



MONEY LAUNDERING AND TERRORIST FINANCING PREVENTION POLICY OF CONCLUSION NEOTALENT S.A.

Introduction

This Money Laundering and Terrorist Financing Prevention Policy sets out the basic principles followed by Neotalent in the prevention, detection and fight against money laundering and terrorist financing.

The duties and obligations set out in this Policy for the Prevention of Money Laundering and Terrorist Financing apply to Neotalent, whereby the respective acts and procedures - whether current or future - must be adopted, adapted and drawn up in accordance with this Policy and the applicable legislation and regulations.

Money laundering

Money laundering is a crime under the terms of the legislation in force, punishing the agent who converts, transfers, assists or facilitates any operation of conversion or transfer of advantages by himself or a third party, directly or indirectly, with the aim of concealing their illicit origin: the fundamental objective of the launderer is to conceal the origin of the funds.

The range of crimes that can trigger an autonomous crime of money laundering is quite broad and diverse. This means that an organization's internal procedures to prevent money laundering must be prepared to understand the range of activities it can encompass.

Terrorist financing

Terrorist financing is characterized by the provision, collection or holding of funds, or products or rights that can be transformed into funds, intended to be used or knowing that they may be used in the planning, preparation, or commission of a terrorist act: one of the objectives of the financiers is to conceal the purpose for which the funds are intended.

Terrorist financing can, therefore, have a lawful or unlawful origin, and for this reason, combined with the fact that the amounts involved may not be very significant, detecting terrorist financing operations is very complex.

General principles

Money laundering and terrorist financing are crimes that are particularly dangerous in society, given their repercussions, and it is imperative that they are combated by all economic agents who, given their economic activity, are particularly likely to deal with situations associated with these types of criminal offenses.

Control

Neotalent has and ensures the effective application of adequate procedures and controls for the effective management of money laundering and terrorist financing risks and compliance with legal and regulatory standards on the prevention of money laundering and terrorist financing.

Identification and due diligence

Prior to establishing a business relationship or transaction, Neotalent adopts due diligence for the purposes of identifying the suitability of the counterparty and/or the ownership of the capital in which to invest, in the context of natural and legal persons, their representatives and beneficial owners.





The business relationships established inevitably have a follow-up inherent to the business or investment made, and the aim is always to ensure that the information provided or inquired about is up-to-date, accurate and complete.

Reporting suspicious transactions

Neotalent will report to the competent authorities any suspicion that potential business or investments, when scrutinized more closely, are related to or originate from criminal activities or are related to the financing of terrorism.

Abstention

Neotalent will refrain from carrying out any operation, present or future, which it knows or suspects may be associated with funds related to the commission of criminal activities or the financing of terrorism.

In addition, any ongoing business or investment operation will be suspended in the event of such suspicion, until it is unequivocally confirmed that such suspicion is unfounded.

Refusal

Notwithstanding the general duty of prior scrutiny inherent in any potential business, Neotalent will always refuse to enter into business relationships or carry out occasional transactions when it does not obtain the identification elements and the respective means of proof provided for the identification and verification of the identity of the owner of the capital of the company with which it is entering into business, its representatives and beneficial owners.

Retention

All documents associated with the establishment and conduct of a transaction are kept under the terms and conditions laid down by law and can be made available promptly to any competent authority on request.

Collaboration

Neotalent undertakes to cooperate promptly and fully with any request from the competent authorities.

Non-disclosure

At no time may Neotalent or any of its employees disclose to its partners, customers or third parties the information that communications have been or will be made to the competent authorities or that internal or judicial investigations are underway, except in the cases provided for by law.

Training

To the extent applicable and taking into account the particularities of the activity of the Group's companies and their respective size, Neotalent ensures that its employees and managers are given specific and regular training to recognize operations that may be related to money laundering or terrorist financing.

Internal Control

Neotalent promotes a culture that fosters a positive and constructive attitude towards risk management and compliance, as well as an accessible and robust internal control framework.

