



# Anti – Money Laundering Policy



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## 1. Policy Statement

The Europe Snacks Group (ie Snacks Développement, S.A.S. and its Subsidiaries, as defined below) is a legal, ethical and transparent company, and it takes the responsibility to ensure and maintain that its assets and resources are not being used for corruption, irregularities, or money laundering. The Group has taken it upon itself to detect frauds, irregularities, abuse of position, and institutional gains.

The Europe Snacks Group has therefore drawn up this Anti-Money Laundering Policy (the "**Policy**") which, together with the related procedures, define the rules to be respected by employees, managing executives and directors of the Group as well as any person acting in the name or on behalf of the Europe Snacks Group.

## 2. Purpose

The purpose of this Policy is to make that the Group's financial processes and procedures are according to the anti-money laundering laws.

## 3. Scope

This Policy applies to every entity related to the Group and its employees, directors, officers, contractors, or any third party working on behalf of the Group as following :

- a) all employees, managing executives and directors of the Europe Snacks Group, irrespective of their level in the hierarchy; and
- b) any person or entity that is a partner of or acting in the name or on behalf of the Europe Snacks Group, anywhere in the world, including, but not limited to, agents, distributors, representatives, contractors, consultants, external consultants, service providers, subcontractors, suppliers, intermediaries, joint venture partners, or any other third party who is or is likely to engage in an activity on behalf of the Europe Snacks Group.

Hereinafter (the "**Affected Persons**").

The Policy is for internal use, and the administration is required to convey it to every concerned person or entity. Failure to comply with the Policy will result in appropriate action.

The Policy, which is part of the Europe Snacks Group's compliance program and of which it is an integral part, applies to all Europe Snacks Group's locations (taking into account, where required, local legal considerations).

The Europe Snacks Group operates in France, Spain and the United Kingdom.

As a result, the Europe Snacks Group is subject to

- French regulations (including transposition of the fifth Anti-Money Laundering Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 via Order 2020-115 and Decrees 2020-118 and 2020-119 with article L. 561-2 6, L. 561-4-1 and followings of the French Monetary and Financial Code),
- Spanish Laws n°12/2003 of 21 May 2003, n°10/2010 of 28 April 2010, and Royal Decree 925/1995 of 9 June 1995,

- English laws and regulations including the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017, the Financial Services and Markets Act 2000, the Proceeds of Crime Act 2002 applicable in the United Kingdom.

#### 4. Definitions

In the present Policy:

- Subsidiary** refers to any company or other legal entity, whether French or foreign, which, directly or indirectly, through one or more intermediaries, is controlled by Snacks Développement; for the purposes of this definition, the term "control" means the direct or indirect holding of the majority of voting rights or of effective monitoring;
- Snacks Développement** refers to the company incorporated under French law with its headquarters in Saint-Denis-les-Lucs, 85170 Saint-Denis-la-Chevasse and registered with the La Roche-sur-Yon Trade and Companies Register under the number 798 741 211;
- Public official** refers to any person holding public authority, entrusted with a public service mission or with a public elective mandate, as well as any person exercising judicial functions or belonging to the judicial staff in France or overseas.

Also affected are:

- any paid or unpaid employee, full or part-time, of a national, regional or local government, an enterprise owned or controlled, in whole or in part, by a State, a government agency or a ministry;
- any person who has an executive, legislative, administrative or judicial mandate of any kind;
- any representative of a political party, leader of a political party or candidate for political office, or his/her representative
- any member exercising judicial functions (magistrates, clerks, mediators, conciliating judges, arbitrators, etc.);
- any person who is an official, employee or agent of a public international organization (eg United Nations, World Bank) or at an international court;
- any person, whether or not an employee, an agent, a representative, remunerated, full or part-time, by a company controlled directly or indirectly by a State (or a legal person governed by public law).

#### 5. Money Laundering

Money laundering refers to those assets that are money that is acquired in exchange for money or assets gained unlawfully. It also includes money spent for terror purposes, regardless of the means it was obtained.

Under this Policy, money earned by using the following means is considered money laundering, and it is prohibited:

- a) Money or assets received in exchange for criminal or unlawful acts. Money whose origin is not explicit or earned by assisting any activity in evading lawful means;

- b) Property gained after any criminal activity and its origin, location, and disposition are not transparent;
- c) Property which is promoting any unlawful activity;
- d) Terrorism financing.

## **6. Compliance**

The Group will establish a body responsible for the implementation of this Policy. The Group will carry out the procedure to identify any irregularity on behalf of any stakeholder under this Policy. The Group should:

- a) Identify all the financers of the company and verify their identity
- b) Take special care where stakeholders want anonymity
- c) Maintain proper records of the stakeholders

If anyone in the Group knows or suspects that a person is involved in money laundering or terror financing, it is their responsibility to report such person to the body established by the Group. In such a case, the Group must:

- a) Take the details of the people involved
- b) Verify the type of transactions
- c) Reason for suspicion
- d) The amount involved

The Group must consult with the legal department before embarking on business with a third party and carefully screen such interactions.

## **7. Accounting Requirements**

The Europe Snacks Group is required to keep accounting books and records, which, in a reasonably detailed manner, give a true and fair view of its assets and operations. To ensure compliance with its legal obligations, the Europe Snacks Group sets up internal or external accounting monitoring systems to ensure that books, records and accounts are not used to mask bribery or influence peddling. The Europe Snacks Group regularly reviews the effectiveness of its measures.

It is forbidden for each of the Affected Persons to:

- a. enter erroneous, inflated or artificial figures in the books and records of the Europe Snacks Group, for any reason whatsoever;
- b. use the funds or assets of the Europe Snacks Group for illegal, inappropriate or unethical purposes;
- c. falsify the accounting records relating to a particular transaction so as to conceal or disguise the true nature of a transaction or activity; or
- d. provide false declarations/information, or mislead the auditors.

## **8. Training and Supervision**

The Europe Snacks Group has set up and is pursuing a program to ensure the continuous training of its managers and staff who are most exposed to the risk of money laundering. They must participate in all mandatory training sessions and respect all the procedures in place.

## 9. Implementation of the Policy

Compliance with this Policy is mandatory and crucial in order to safeguard the interests of the Europe Snacks Group. The Group Legal Officer is responsible for the day-to-day implementation of the Policy and the monitoring of its implementation and effectiveness. Moreover, he/she answers all questions relating to the Policy.

All employees are required to:

- learn, understand and comply with the obligations imposed by the Policy;
- implement the obligations imposed by the Policy while exercising their professional responsibilities and activities;
- retain evidence of compliance with the Policy, such as payment receipts;
- report any violation of the Policy through the reporting procedure described below; and
- cooperate fully in any audit or investigation of potential violations/breaches of the Policy.

Every supervisor has the additional responsibility to:

- ensure that their subordinates are aware of and understand the provisions of the Policy; and
- take all necessary measures to prevent or identify possible shortcomings.

Violation of this Policy may result in disciplinary action, including termination of employment.

This Policy is incorporated into the internal rules of each company concerned.

This Policy will be reviewed at regular intervals and may be subject to additions or modifications. Any additions or changes will be submitted to Group Legal Officer and, where appropriate, the Policy should be subject to a new procedure for consultation with staff representatives.

## 10. Reporting Breaches

Europe Snacks Group sets up a system for the collection of reports issued by warning launchers in its Whistleblowing policy.

Alternatively, any report of breach can be submitted to the Legal department at [corporate.compliance@europesnacks.com](mailto:corporate.compliance@europesnacks.com).

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The Policy is subject to updates and amendments, which will be communicated to the stakeholder immediately.