



Anti-Money Laundering Policy



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1. Policy statement

Europe Snacks Group (i.e. Snacks Développement S.A.S. and its subsidiaries, as defined below) is an ethical and transparent private company that takes responsibility for ensuring that its assets and resources are not used for corruption, irregularities or money laundering. The Group is committed to detecting fraud, irregularities, abuse of position and illicit gains.

Europe Snacks Group has therefore developed this Anti-Money Laundering Policy (the “**Policy**”) which, together with related procedures, sets out the rules that employees, executives, directors of the Group and any person acting on behalf of or for the account of Europe Snacks Group must follow.

2. Purpose

The objective of this Policy is to ensure that the Group's financial rules and procedures comply with Anti-Money Laundering laws.

3. Governance and Allocation of Responsibility

The Ethics Committee is responsible for promoting and maintaining a culture of integrity, honesty, and ethical conduct regarding the prevention of money laundering and terrorist financing within the Europe Snacks Group. In particular, it:

- Promotes a culture in which ethics and the fight against money laundering and terrorist financing are a top priority;
- Rejects any transaction, business relationship, or commercial practice that may violate internal or external AML/CFT rules, even if this may result in short-term business losses;
- Ensures that sufficient and appropriate resources are allocated to ethics initiatives, including ethics training, and
- Sets an example by behaving ethically in accordance with the requirements of this policy in all business activities.

The Ethics Committee consists of:

- The three Chief Executive Officers
- The Director of Human Resources, and
- The Group Legal Officer

The prevention of money laundering and terrorist financing is a priority within the Europe Snacks Group. Everyone, at all levels of the organization, is required to act with integrity, comply with internal AML/CFT procedures, and contribute to maintaining high standards of compliance.

In its role as a model, the Ethics Committee promotes the development of an ethical corporate culture and ensures that sufficient and appropriate resources are allocated to it. It assumes overall responsibility for governance in this area and sets the tone at the highest level.

4. Scope of application

This Policy applies to all entities affiliated with the Group and to its employees, directors, agents, contractors, or any third party working on behalf of the Group as follows:

- a) All employees, senior executives and directors of Europe Snacks Group, regardless of their hierarchical level; and
- b) Any individual or entity acting on behalf of or for the account of Europe Snacks Group, anywhere in the world, including, but not limited to, agents, distributors, representatives, subcontractors, consultants, external consultants, contractors, suppliers, intermediaries, joint venture partners or any other third party engaged or potentially engaged in activities on behalf of Europe Snacks Group.

Hereinafter (the “**Persons Concerned**”).

This Policy is for internal use, and the Group's administration is responsible for communicating it to all relevant individuals or entities. Failure to comply with any of its obligations will result in appropriate measures being taken.

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

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

Europe Snacks Group is subject to the following regulations and laws¹:

- The applicable French regulations are based on EU Directive 2024/1640 of the European Parliament and the Council, and EU Regulation 2024/1620, which together establish the new legal framework governing anti-money laundering and counter-terrorist financing requirements².
- Spanish Laws No. 12/2003 of May 21, 2003, Law No. 10/2010 of April 28, 2010, and Royal Decree 7/2021 of April 27, 2021.
- UK laws and regulations include the Money Laundering, Terrorist Financing, and Transfer of Funds Regulations 2017, the Financial Services and Markets Act 2000, and the Proceeds of Crime Act 2002, applicable in the United Kingdom. It should be noted that the Financial Conduct Authority is responsible for combating money laundering and other criminal activities, such as terrorist financing. The powers of this authority include: establishing regulations, supervising financial institutions in the United Kingdom, and authorising these institutions to operate within UK territory.

5. Definitions

For the purposes of this Policy:

¹ Europe Snacks Group reserves the right to amend this policy as soon as the transposition of the European Directive is implemented in each country.

² Before the unification of regulations on money laundering, the implementation of the Fifth Directive (EU) 2018/843 of the European Parliament and the Council of May 30, 2018, was applicable through Ordinance 2020-115 and Decrees 2020-118 and 2020-119, along with Articles L.561-2 6, L.561-461, and subsequent articles of the French Monetary and Financial Code.

- a. **Subsidiary** refers to any company or other legal entity, whether French or foreign, that is directly or indirectly controlled by Snacks Développement through one or more intermediaries. For the purpose of this definition, “control” means the direct or indirect holding of the majority of voting rights or effective control;
- b. **Snacks Développement** refers to the French company headquartered at Saint-Denis-les-Lucs, 85170 Saint-Denis-la-Chevasse, and registered in the Trade and Companies Register of La Roche-sur-Yon under number 798 741 211;
- c. **Public official** refers to any person exercising public authority, responsible for a public service mission, or holding a public elective office, as well as any person performing judicial functions or belonging to judicial personnel in France or abroad.

This also includes:

1. any full-time or part-time employee, whether paid or unpaid, of a national, regional, or local administration, or of a company wholly or partially owned or controlled by a state, government agency, or ministry;
2. any person holding an executive, legislative, administrative, or judicial mandate of any kind;
3. any representative of a political party, leader of a political party or candidate for political office, or their representative;

4. any member performing judicial functions (judges, clerks, mediators, conciliators, arbitrators, etc.);
5. any person who is a civil servant, employee or agent of a public international organisation (e.g. the United Nations, the World Bank) or an international court;
6. any person who is an employee, agent, or representative, whether full-time or part-time, paid or unpaid, of a company directly or indirectly controlled by a state (or a public legal entity).

6. Money laundering

Money laundering refers to assets derived from money or goods obtained illegally. This also includes money spent for terrorist purposes, regardless of how they were acquired.

Under this Policy, money obtained through the following means is considered to be money laundering and it is prohibited to:

1. Receive money or property in exchange for criminal or illegal acts or money whose origin is unclear or money earned by helping an activity to evade legal means;
2. Acquire property as a result of criminal activity and when its origin, location and disposition are not transparent;
3. Possess property that promotes an illegal activity;
4. Contribute to the financing of terrorism.

7. Compliance

The Group will establish an entity responsible for implementing this Policy.

The Group will implement the procedure for identifying any irregularities on behalf of any stakeholder in line with this Policy. The Group must:

1. Identify all the investors in the company and check their identities
2. Be particularly vigilant when stakeholders wish to remain anonymous
3. Maintain appropriate stakeholder registers

If a member of the Group knows or suspects that an individual is involved in money laundering or financing of terrorism, it is their responsibility to report it to the entity established by the Group. In such a case, the Group must:

1. Take the contact details of the individuals involved
2. Check the type of transactions
3. Indicate the reason for suspicion
4. Indicate the amount involved

Before initiating business relationships with a third party, the Group must consult its legal department and carefully screen the interactions.

8. Accounting requirements

Europe Snacks Group is required to maintain accounting records and registers that reasonably and accurately reflect its assets and operations. To ensure compliance with legal obligations, Europe Snacks Group implements internal or external accounting tracking systems to ensure that books, registers and accounts are not used to conceal bribes or any form of undue influence. Europe Snacks Group regularly assesses the effectiveness of its measures.

It is prohibited for any Persons Concerned to:

1. enter inaccurate, inflated or artificial figures in the books and registers of Europe Snacks Group for any reason whatsoever;
2. use the funds or assets of Europe Snacks Group for illegal, inappropriate or unethical purpose;
3. falsify accounting documents relating to a particular transaction in order to conceal or disguise the true nature of an operation or activity; or
4. provide false statements/information or mislead auditors.

9. Training and Monitoring

Europe Snacks Group has established and continues to implement a programme aimed at ensuring ongoing training for its managers and employees most exposed to the risk of money laundering. They are required to participate in all mandatory training sessions and comply with all established procedures.

10. Implementation of the Policy

Compliance with this Policy is mandatory and crucial in order to protect the interests of Europe Snacks Group. The Group Legal Officer is responsible for the daily implementation of the Policy and ensuring its application and effectiveness. Additionally, the Legal Officer is the point of contact for any questions related to the Policy.

All employees are required to:

1. learn, understand and comply with the obligations imposed by the Policy;
2. implement the obligations set forth by the Policy in the performance of their professional duties and activities;
3. retain evidence of compliance with the Policy, such as payment receipts;
4. report any violations of the Policy through the reporting procedure described below; and
5. cooperate fully with any verification or investigation into potential breaches/non-compliance with the Policy.

Each supervisor has the additional responsibility of:

1. ensuring that their subordinates are aware of and understand the provisions of the Policy; and
2. taking all the necessary measures to prevent or identify potential breaches.

Violations of this Policy may lead to disciplinary actions, including dismissal.

This Policy is incorporated into the internal regulations of each subsidiary concerned.

This Policy will be reviewed regularly and may be subject to additions or amendments. Any additions or amendments will be submitted to the Group Legal Officer and, if necessary, the Policy will be subject to a new consultation procedure with employee representatives.

11. Reporting violations

Europe Snacks Group has established a reporting system for whistleblowers as part of its whistleblowing policy.

Alternatively, any reports of violations can be submitted to the Legal Department at the following email address corporate.compliance@europesnacks.com.

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This policy was updated in June 2026, and it may be adjusted at any time and will be immediately communicated to all stakeholders.