

# Anti-Money Laundering and Terrorist Financing Directive

**SENSECA Group**

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Authorised from	CFO/COO
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Date	Version	Name	Title
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**Gender Notice**

For better readability, the generic masculine is used in this document. The personal designations used refer to all genders – unless otherwise indicated.



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## 1. Introduction

SENSECA strives to conduct its business in accordance with the strictest ethical principles.

Therefore, we have adopted a "zero tolerance" policy regarding money laundering and terrorist financing, as well as other unethical and fraudulent behaviors.

SENSECA strictly prohibits its employees, business partners, agents, contractors and other third parties from engaging in or permitting any type of practice or scheme that involves or permits active or passive money laundering, terrorist financing and any such activities that may violate our policies.

## 2. The definition

### 2.1. Money laundering

Money laundering is a criminal act by which someone gives the appearance of legality in exchange for goods or benefits derived from criminal acts. These criminal acts may include, but are not limited to:

- Participation in an organized criminal organization and extortion (including drugs and narcotics)
- Human trafficking and smuggling (smuggling)
- Sexual exploitation
- Fraud and deception (including fraudulent bankruptcy)
- Product counterfeiting and piracy
- Environmental crime and offences

Money laundering is a criminal offence in many jurisdictions. In the European Union, the 6th Anti-Money Laundering Directive establishes a number of measures that are implemented in the national laws of the member states, including alerting the authorities in the event of suspicion of money laundering.

### 2.2. Terrorist financing

Terrorist financing refers to the provision or procurement of funds, valuables or other assets of any kind in the knowledge that they will be used by terrorist groups or to participate in crimes such as terrorist attacks (including cyberattacks) or hostage-taking. Such funds and assets are identified as means of terrorist financing, even if they have not actually been used for these crimes, or if they are not related to specific terrorist acts.

## 3. Prevention principles

If SENSECA were involved in a money laundering or terrorist financing situation, not only SENSECA but also management and/or any other employees involved could be held liable, and the consequences could include, but are not limited to:

- Significant negative impact on the company's reputation
- Fines for the company that can reach enormous sums
- employees could face very high fines and/or imprisonment
- Prohibition of business transactions
- Failure to comply with anti-money laundering regulations can also lead to a potential loss of export privileges.

### 3.1. Shared vigilance

All employees and management of SENSECA are expected to be vigilant and actively participate in anti-money laundering and terrorist financing activities. SENSECA will ensure that the most affected employees receive specific and regular training in order to achieve a high level of awareness among employees on the aforementioned issues.

As a breach of this policy would also likely constitute a breach of the law, any doubts, questions or concerns about a case should be reported promptly and appropriately:

- Questions for Compliance Officers
- Dilemmas about the usual organizational levels: supervisors, human resources managers or about our
- SENSECA Whistleblowing Procedures

### 3.2. Risk-based procedures

SENSECA has organised its AML/CFT procedures according to a risk-based approach, applying the following key general principles:

- We counter internal risks with our strict internal guidelines. This includes our Code of Conduct, this Policy, the Anti-Corruption and Bribery Policy, and the associated periodic awareness-raising activities aimed at different groups of employees.
- External risks are monitored primarily thanks to a precise analysis of SENSECA's business partners, both before the establishment of a business relationship and during the duration of the business relationship. This analysis leads to a risk assessment and correspondingly adapted monitoring procedures depending on the assessment. The external risk assessment should be taken into account at all times and regularly updated at the relevant levels of the organisation.

### 3.3. Roles and responsibilities

SENSECA will ensure that all the necessary tools, tools and processes are in place to support the company and its employees in understanding their obligations with regard to combating money laundering or terrorist financing, and to enable them to analyse a situation and take the most appropriate measures.

In particular, it is the responsibility of SENSECA's Compliance Officer:

- ensure that SENSECA has appropriate policies, procedures and controls in place;
- act as the main point of contact within SENSECA and vis-à-vis the competent authorities;
- Assume responsibility for training relevant staff and management;
- define the resources and organisation required to implement the necessary controls;
- to keep the management and management of SENSECA up to date.

The Group's Compliance Officer performs his or her duties independently and is entitled to examine (and request audits) and assess all AML/CFT matters.

## 4. Scope of Application

This policy applies to all employees and (m/f/d) of the company at all companies belonging to the SENSECA Group.

## 5. Responsibilities

This guideline is reviewed once a year to ensure that it is up to date. The following functionaries are responsible for this policy:

- Compliance-Manager
- Sustainability Officer

## 6. Date of Getting into Force

This Code of Conduct comes into force on 19.07.2024 and replaces all previous publications and regulations.

Date	Name	Title	Signature
19-07-2024	Jürgen Schneider	COO/CFO	