

ANTI-MONEY LAUNDERING POLICY AND FIGHT AGAINST TERRORISM FINANCING

In order to ensure the correct fulfillment of the AML/CFT obligations, CLARIMOND MANIFATTURA SRL operates in compliance with the following principles:

- Prohibition to enter into relations, relations, operations with "shell banks" or trust companies, anonymous companies or subsidiaries through bearer shares based in high-risk third countries.
- Prohibition to maintain relationships with individuals who are residents or who carry out their main activity in countries under total embargo;
- Prohibition of carrying out operations involving for any reason subjects included in the applicable national or international anti-terrorism black lists;
- Prohibition to maintain relations with subjects convicted (even if not definitively) for the following crimes: association with the purpose of terrorism, including subversive association, weapon crimes against the State, mafia association, criminal association aimed at committing crimes, prerequisite money laundering or terrorist financing, human trafficking, drug trafficking;
- Request, on the basis of a risk-based approach, of specific declarations to the client regarding the correct fulfillment of tax obligations;
- Systems of periodic and episodic information flows, both qualitative and quantitative, aimed at bringing to the attention of the corporate bodies and control functions, any significant events that may affect exposure to ML/FT risk;
- Continuous training programs for employees and collaborators;

Roma, 10.07.2024

The Management