

## **POLICY ON THE PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING**

### **1.**

#### **(Scope and framework)**

1. Semapa - Sociedade de Investimento e Gestão, SGPS, S.A. (hereinafter, "Semapa" or "Company") acknowledges that combating and preventing money laundering and terrorist financing, as provided for herein, is a guiding principle of its activities and is part of its commitment to sustainable development.
2. This policy is a benchmark for and governs the activities of Semapa and of the companies which are in a control or group relationship with the Company (hereafter "Semapa Group"), regardless of the location of their head offices and activities, concerning the combat and prevention of money laundering and terrorist financing. The companies shall adopt principles and commitments equivalent to those set out in this policy, taking into account the context and specific features of their respective activities and in compliance with the legislation applicable to them.
3. The principles and rules set out in this policy shall apply to all members of Semapa's governing bodies, members of the committees, representatives, service providers and staff, hereinafter jointly referred to as Staffers, who undertake to comply with them.
4. Semapa's commitments to combat and prevent money laundering and terrorist financing are based the assumption of compliance with the laws and regulations in force and applicable to the activities performed in the relevant jurisdictions.

### **2.**

#### **(Commitments)**

In accordance with the provisions in this policy, Semapa makes the following commitments to combat and prevent money laundering and terrorist financing:

- a) Semapa and its Staffers shall comply with the laws and regulations on combating and preventing money laundering and financing of terrorism applicable in the jurisdictions where the respective activities are conducted;

- b) Semapa and its Staffers shall not engage in any relationship with entities that, to their knowledge, carry out illicit activities and whose sources of income are also illicit and relate to money laundering or the financing of terrorism, or present a high risk of involvement in such activities;
- c) Semapa and its Staffers shall adopt measures to prevent illegal practices concerning money laundering and financing of terrorism;
- d) Semapa undertakes to train its staff in subjects such as anti-money laundering and terrorist financing issues, especially those whose duties require it, and
- e) Semapa undertakes to encourage the reporting of suspicion of money laundering or terrorist financing by following the applicable reporting procedures or through Semapa's Whistleblowing Channel.

### **3.**

#### **(Disclosure, implementation and monitoring)**

- 1. Semapa shall promote the disclosure of this policy across the Company and the Semapa Group and to current employees or those who may work for Semapa in the future, thereby imbuing its corporate culture with this policy, namely by holding training sessions and incorporating its principles and commitments in operational procedures.
- 2. The Board of Directors shall approve the acts necessary for the adoption of this policy and the Executive Committee or the Chief Executive Officer, as applicable, shall undertake the concrete measures for its disclosure and enforcement, including the implementation of the necessary mitigation, correction or remedy measures to be applied.
- 3. The Corporate Governance Committee will help the Board of Directors monitor the implementation of this policy and, if appropriate or necessary, review it.
- 4. Semapa Staffers are responsible for reporting acts of non-compliance with the principles and commitments set out in this policy and for detecting any nonconformities by following the reporting procedures in force or Semapa's Whistleblowing Reporting Channel.

5.

**(Adoption and entry into force)**

This policy was adopted by the Board of Directors on 27 February 2023, on a proposal from the Executive Committee and after consulting the Audit Board and the Corporate Governance Committee. The policy shall take effect on the date of adoption<sup>i</sup>.

The Board of Directors

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<sup>i</sup> Policy amended by decision of the Board of Directors of 30 May 2025.