



PREVENTION OF MONEY LAUNDERING  
AND TERRORIST FINANCING AND  
INTERNATIONAL SANCTIONS  
Internal Regulations – Corporate Policies

Date: April 2022

Code: PC-04-5.2-06-202111

## Introduction

Approval of the Policy for Prevention of Money Laundering and Terrorist Financing and International Sanctions (hereafter the “Policy”) of Global DOMINION Access, S.A., (hereafter “**DOMINION**”) is yet another milestone in DOMINION's steadfast commitment to lawfulness, ethics and professionalism that underpins how it conducts its operations and its corporate culture. Pursuant to this Policy, DOMINION is firmly committed to:

- | Complying with and fully adhering to all current legislation (both nationally and in the countries where it operates).
- | Complying with the principles that govern its Code of Conduct which forms the basis of the Policy set out here.
- | Training and raising awareness of the Obligated Parties (as this term is defined below), as well as stakeholders, of the importance of complying with this Policy.
- | Applying penalties for non-compliance with the provisions set out herein, pursuant to the applicable disciplinary measures.

This DOMINION policy sets out the conduct guidelines to follow for the prevention of money laundering and terrorism financing, as well as for compliance with sanctions programmes and international countermeasures.

## Scope of application

The Policy applies to all employees, managers and directors of all the companies that make up DOMINION (hereafter "**Obligated Parties**").

For the purposes of this Policy, "DOMINION" shall also mean all companies which Global DOMINION Access, S.A. controls or may control, directly or indirectly, with control being understood to be:

- (i) holding the majority of the voting rights;
- (ii) the right to appoint or remove a majority of members of the Board of Directors; or
- (iii) holding the majority of the voting rights pursuant to eventual agreements made with third parties.

Likewise, all third parties who have dealings with DOMINION will also indirectly receive this document and, whenever possible, must be made aware of the underlying principles and values.

## Money Laundering and Terrorism Financing Concept

For the purposes of this policy, the following activities are understood as Money Laundering:

- | The conversion or transfer of property, knowing that the property is derived from criminal activity or from participation in a criminal activity for the purpose of concealing or disguising the illicit origin of the property or of assisting any person involved to evade the legal consequences of their actions.
- | The concealment or disguise of the nature, source, location, disposition, movement, or ownership of property or rights to property, knowing that this property is derived from criminal activity or from participation in criminal activity.
- | The acquisition, possession or use of property, knowing, at the time of its receipt, that the property is derived from criminal activity or from participation in criminal activity.
- | The participation in, association to commit, attempts to commit and aiding, abetting, and counselling any person to carry out or facilitate the actions mentioned in the previous paragraphs.

Moreover, for the purposes of this Policy, Terrorism Financing is understood as the supply, the deposit, the distribution or collection of funds or property, by whatever means, directly or indirectly, with the intention of using them or with the knowledge that they will be used, fully or in part, for the commission of any terrorist crime.

## International Sanctions concept

For the purposes of this policy, International Sanctions is understood as those instruments of a political, diplomatic or economic nature used by countries and international or supranational bodies with the aim of implementing restrictive measures that prevent breaches of international law, human rights or civil rights and liberties.

## Action principles

The principles which govern this Policy are as follows:

- | A ban on any operation with property knowing it derives from criminal activity. DOMINION does not allow any operations to be carried out or participation in them with property that is known to derive from criminal activity. In this regard, DOMINION will not conceal or disguise the nature, source, location, disposition or true ownership of this type of property.
- | Compliance with the current regulations DOMINION is committed to preventing money laundering and terrorism financing. It involves all personnel in this objective, especially in those departments determined as at risk, by implementing the appropriate control measures for complying with current regulations applicable in this regard.

- | Information to competent bodies. In order to comply with current regulations, any event or operation where they could be an indication or certainty of its relationship with money laundering or terrorism financing will be communicated to the established competent public bodies, without delay and based on the corresponding form and procedures.
- | Adoption of internal money laundering and terrorism financing prevention procedures. Procedures will be established to apply to the activities and procedures likely to be subject to the control of the money laundering and terrorism financing prevention policies.
- | Training and suitability of personnel. To extend the preventive culture and ensure the effectiveness of the implemented prevention system, training and awareness actions will be carried out aimed at the most directly affected areas.
- | Full cooperation in the efforts relating to money laundering and terrorism financing prevention and international sanctions. DOMINION will fully cooperate in the event of a request for information or assistance by competent bodies regarding money laundering and terrorism financing prevention and international sanctions.

## Expected Acts of Conduct

### Knowledge of business associates

DOMINION will identify and have knowledge of its business associates (franchisees, agents, suppliers and other business associates) in accordance with the due diligence measures that it establishes in its internal standards and any applicable legislation. In this regard, prior to the establishment of business relationships, DOMINION will identify the business associate and its true owner, and will verify that it is not subject to any international sanctions in commercial relationships.

Therefore, DOMINION will not engage in commercial relationships with potential business associates where there is a certainty or substantiated indications that they are related to money laundering and/or terrorism financing.

DOMINION may develop, as applicable, a procedure for the Identification and Knowledge of Business Associates for the purposes, among others, of identification of business associates and the real owner, and to verify that they are not subject to any international sanctions in commercial relationships. DOMINION will not establish business relationships when it cannot apply the due diligence measures that are set out in this paragraph.

### Limitation of cash receipts and payments

Generally, DOMINION will not make payments in cash to suppliers or employees.

DOMINION has a Cash Payment Limitation Procedure (hereafter the "Procedure") for certain business units, which sets out the control mechanisms for cash payments from its customers. DOMINION cannot take cash payments from its customers for an amount greater than that

established in the Procedure, or an amount in the equivalent corresponding currency (hereinafter, the “Limit”). To this end, the control mechanisms provided in the Procedure are established.

## Control of International Sanctions lists

For compliance with the restrictions imposed by the International Sanctions programmes, DOMINION shall:

- | Identify and monitor the Sanctions programmes implemented by the United Nations (<https://www.un.org/securitycouncil/sanctions/information>), The European Union (<https://www.sanctionsmap.eu/#/main>), OFAC (<https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>) and the local programs applicable in the DOMINION jurisdictions.
- | Assess the risks associated with the activities related to the Sanctions Programmes to determine the risks of participating or becoming involved in activities restricted or prohibited by the Sanctions.
- | Refrain from executing or participating in projects, operations or transactions with sanctioned persons.
- | Comply with the bans and restrictions in the execution of transactions, payments or commercial relationships and refrain from executing them when a breach of the Sanctions programmes is assumed.
- | Implement internal control procedures and prevention mechanisms that enable proper compliance with the obligations by DOMINION.

## Communication of questions about the Policy

All the Obligated Parties and third parties can contact DOMINION's Risk & Compliance Department in order to resolve any query or question that may arise in the application of the Policy.

## Reporting Wrongdoings

All Obligated Parties and third parties have a Whistleblowing channel to report any conduct that may involve any wrongdoing or any illegal actions or any actions that go against the Code of Conduct or Policy. For further details regarding the Whistleblowing Channel, consult the [Code of Conduct](#).

## Document sheet

Document table:

Document Type	Code of Conduct
Document code	PC-04-5.2-06-202111
Date of the document	November, 2021

Prepared by:

Name or role	Remarks	Date
Risk & Compliance Department		November, 2021

REVISED BY:

Name or role	Remarks / Approved by	Date
Audit and Compliance Committee		

Table of Editions:

Version	Date	Description