



QUINTA NOVA  
DE NOSSA SENHORA DO CARMO

**TABOADELLA**  
1255

## POLICY FOR THE PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

October 7, 2024

Approved by the Board of Directors of Quinta Nova de Nossa Senhora do Carmo, S.A. e da Taboadella, S.A. at meetings held on October ,7 2024

## I – Introduction

Quinta Nova de Nossa Senhora do Carmo, S.A. ("**Quinta Nova**") and TABOADELLA, S.A. ("**Taboadella**") conduct their business activity based on high standards of integrity and transparency, repudiating any illicit activity and illegitimate sources of income.

In light of these concerns, this Policy for the Prevention of Money Laundering and Terrorist Financing is governed by the legislative framework on the prevention of money laundering and terrorist financing, even though Quinta Nova and Taboadella are not considered obligated entities under the terms and for the purposes of Law no. 83/2017, of 18 August ("**Law no. 83/2017**").

The Policy aims to prevent and detect money laundering and terrorist financing in transactions carried out within the scope of Quinta Nova and Taboadella's business activity.

## II – Definitions

- a. "**Beneficial Owner**": the natural person who ultimately owns or controls the client or the natural person on whose behalf a transaction or activity is carried out.
- b. "**Money Laundering**": process by which the perpetrators

of criminal activities conceal the origin of illicitly obtained assets and income, transforming the proceeds from these activities into legally reusable capital, by obscuring the origin or the true owner of the funds.

Illicitly obtained income is typically related to the commission of crimes such as drug trafficking, influence peddling, undue receipt of an advantage, corruption, embezzlement, graft, fraud, tax fraud, among others.

The money laundering process comprises three phases:

- i. **Placement**: assets and income are introduced into financial and non-financial channels, for example through deposits in financial institutions or investments in profitable activities and high-value assets;
- ii. **Layering**: assets and income are subject to multiple and repeated transactions (e.g. movements of funds), with the aim of distancing them from their criminal origin, thereby eliminating any trace of their provenance and ownership;
- iii. **Integration**: goods and income that have already been recycled are reintroduced into legitimate financial channels by being used, for

example, to acquire goods and services;

- c. **"Terrorist Financing"**: provision, collection, or holding of funds or property, directly or indirectly, with the intent that they be used, or in the knowledge that they will be used, in whole or in part, for planning, preparing, or perpetrating terrorist acts, or any other act intended to cause death or serious bodily injury to a civilian or to any person not taking a direct part in hostilities in a situation of armed conflict, where the purpose of such an act, by its nature or context, is to intimidate a population or to compel a government or an international organisation to perform or refrain from performing any act.

Unlike in money laundering, where the fundamental objective is to conceal the origin of the funds, in terrorist financing, one of the objectives of financiers is to conceal the purpose for which the funds are intended. Thus, funds directed towards terrorist financing may have a licit or illicit origin.

### III – Limits on cash payment

It is forbidden to pay or receive cash payments in transactions of any kind involving amounts equal to or greater than €3,000 (three thousand euros) or its equivalent in foreign currency.

### IV – General preventive duties

Although Quinta Nova and Taboadella are not considered obligated entities under the terms and for the purposes of Law 83/2017, they must conduct themselves in compliance with certain preventive duties in terms of money laundering and terrorist financing:

- a. They must only deal with customers, suppliers and other business partners who carry out legitimate business activities, who use funds obtained lawfully and for whom no restrictive measure adopted by the United Nations Security Council and/or the Council of the European Union has been applied;
- b. Whenever clients, their representatives or Beneficial Owners are Politically Exposed Persons, as defined by law, Quinta Nova and Taboadella must detect this and adopt the necessary measures to prove the origin of the assets and funds involved.

There are certain factors that could indicate a high risk for the client and which Quinta Nova and Taboadella should pay attention to:

- a. Foreign clients;
- b. Clients with links to countries with a high risk of corruption or criminal organisations;
- c. Politically exposed people;
- d. The client tries to reduce the value of the transaction to a specific value, thereby seeking to avoid application of the rules on the prevention of money laundering and terrorist financing;
- e. The client is mentioned in news connected with illegal activities or is suspected of committing crimes;
- f. The client has been subject to restrictive measures imposed by the UN and/or the European Union;
- g. The client refuses to provide personal data associating them with the ownership of goods or the data of the Beneficial Owner;
- h. Transactions where payment is made through third parties involved in the process.

Whenever it is known, suspected or there are reasons to suspect that certain funds or other assets, regardless of the amount involved, come from criminal activities or are related to the financing of terrorism, this fact must be immediately reported by Quinta Nova or Taboadella to the Central Department of Investigation and Criminal Action (DCIAP) and the Financial Intelligence Unit (UIF).

In addition, they must refrain from carrying out any present or future transaction or set of transactions that they know or suspect may be associated with funds or assets originating from or related to criminal activities or terrorist financing, and immediately report them.

## A. Regulatory compliance officer

Quinta Nova and Taboadella have appointed a compliance officer who will monitor compliance with the regulatory framework on the prevention of money laundering and terrorist financing.

## V – Non-compliance

Violation of any of the rules set out in this Policy may constitute a disciplinary offence and/or criminal offence, punishable, under the law, by disciplinary and/or criminal proceedings against the offender. In the event of losses to Quinta Nova and/or Taboadella as a result of this breach, the offender will also be held civilly liable for the losses caused.

In the event that non-compliance with the Policy involves a Third Party, in addition to the latter being held civilly and/or criminally liable,

Quinta Nova or Taboadella may terminate the contractual relationship previously maintained between the two parties.

## **VI – Data protection and processing**

Quinta Nova and Taboadella process personal data and the necessary supporting documents to fulfil their obligations in this regard, solely for the purpose of preventing money laundering and terrorist financing, adopting the necessary security measures to ensure the effective protection of the information and personal data processed, in accordance with European and national legislation.

## **VII – Disclosure and training**

This Policy is made available to Employees through the Intranet.

It will also be made available to Third Parties representing Quinta Nova or Taboadella or who establish contractual relations with either company.

In addition, this Policy forms an integral part of Quinta Nova's and Taboadella's training plan and programme, with attendance mandatory for all Employees.

## **VIII – Approval and validity**

This Policy took effect on October 7, 2024 2024, the date on which it was approved by the Board of Directors of Quinta Nova and Taboadella.

Mozelos, October 7, 2024