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Certified N. RjC-CoP 0000 4750 – RjC – CoC C0000 4779
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ANTI-MONEY LAUNDERING AND TERRORIST FINANCING PROCEDURE

FOREWORD

I FANTON S.R.L. In compliance with the regulatory provisions on anti-money laundering and the financing of international terrorism, it has implemented an effective risk management policy aimed at preventing involvement in events that may have negative repercussions on its stability and reputation.

Money laundering is the process by which the illegal origin of money or other proceeds (such as raw materials) is concealed in such a way that they appear to derive from legitimate sources. It is illegal, unethical, and facilitates criminal behavior. Failure to address the risk of money laundering can compromise reputation, lead to investigations, fines, and other penalties for the company.

This anti-money laundering policy sets out the approach of **I FANTON S.R.L.** to ensure compliance with all applicable laws and regulations to prevent money laundering and adequately manage the risks involved, and applies to all employees and directors. **I FANTON S.R.L.** also asserts its influence over its suppliers to encourage them to act in a manner consistent with the intent of this policy.

The updating of this policy, as well as the verification of compliance with internal procedures and provisions, is entrusted to the Company's Management which, in collaboration with the other functions of the internal control system, is called upon to ensure the effectiveness of the activities put in place to mitigate the risk of money laundering and the related reputational risk.

COMMITMENT

I FANTON S.R.L. is aware of the risk that third parties exploit us to launder money. With this in mind, the company does not assist, support, participate in or allow money laundering or terrorist financing by implementing the following actions:

- We do not accept payments in money or other goods if there is any doubt that they derive from criminal activities of any kind.
- It does not facilitate the acquisition, ownership or control of criminal proceeds or other assets derived from criminal activities.
- Tax evasion of any kind is not tolerated

To manage exposure to the risk of money laundering and ensure compliance, **I FANTON S.R.L.** implements a series of controls and processes. These include:

- Conduct Know Your Counterparty procedures and due diligence procedures to determine where counterparties come from and where they are
- implement controls against payments that are made and received by adopting a risk-based approach to ensure that they are consistent with the requirements of this policy

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- require employees to pay attention to any unusual or suspicious payments that could expose the company to the risk of money laundering or facilitating tax evasion, and to report such occurrences.

KNOWLEDGE OF THE COUNTERPARTY

As indicated above, knowing your customer (KYC) is an essential issue of national and European legislation in the field of financial relations. An adequate customer check, in addition to being a valid tool for combating money laundering and terrorist financing, **protects I FANTON S.R.L.** from exposure to commercial and reputational risks. **I FANTON S.R.L.** carries out customer due diligence and monitors the activity through the analysis of the following parameters:

- legal nature;
- activity carried out;
- conduct at the time of the opening of the ongoing relationship or at the completion of the transaction;
- geographical area to which they belong;
- type of transaction or relationship;
- amount of the transaction;
- Respectability in the industry

ANTI-MONEY LAUNDERING PROCEDURE

The acquisition of this series of information on customers, derived from internal and external data, allows **I FANTON S.R.L.** to be able to determine for each customer the relative money laundering risk profile which will be subjected to periodic monitoring based on the review of the relationship established.

SUSPICIOUS TRANSACTION REPORTING

I FANTON S.R.L. , on the basis of the provisions in force, has adopted a process for reporting transactions that raise suspicion about the illicit origin of payments.

I FANTON S.R.L. has sensitized its employees and suppliers to report problems relating to possible violations of the Code of Conduct and this policy to their manager or through other reporting channels available, including anonymous ones.

I FANTON S.R.L. does not tolerate retaliation against those who speak openly of conduct that they believe to be unethical, illegal or not in line with company policies, even if the reported problem is unfounded, and as long as a knowingly false problem has not been reported.

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KYC, which stands for "Know Your Customer," is a set of procedures used to verify the identity of customers and assess their risk profile, particularly in the financial sector. These procedures are crucial for preventing illegal activities such as money laundering and terrorist financing.

In detail, KYC involves:

- **Customer identification:**
- Collection of personal information such as first name, last name, date of birth, address, etc.
- **Identity verification:**
- Checking the authenticity of the documents submitted by the client, often using official identity documents.
- **Risk assessment:**
- Customer profile analysis to determine the level of risk associated with the business relationship, such as high, medium, or low.
- **Continuous monitoring:**
- Surveillance of customer transactions and activities to detect suspicious behavior over time.

KYC procedures are a legal requirement for many businesses, especially those operating in the financial sector, such as banks, payment institutions, and cryptocurrency platforms. The main goal is to ensure the security and transparency of operations, protecting both the company and the customer from potential risks.

In addition to identity verification, businesses can also use more advanced techniques, such as biometrics, to further improve the security of KYC processes.

Monticello Conte Otto (VI), 01.04.26

I FANTON S.R.L.