

## P-011CA | Prevention of Money Laundering and Terrorist Financing Policy

### Company's position

With the purpose of preventing, detecting and responding to the risks of exposure to transactions with third parties whose aim is to (i) transform funds of criminal origin into lawful funds through money laundering mechanisms or ii) indirectly finance terrorist organizations or contribute to the proliferation of weapons of mass destruction, Floene Energias, S.A. (FLOENE) undertakes to:

- Initiate/maintain commercial/institutional relations only with people and entities that, to the best of its knowledge, pursue legitimate activities, whose sources of income are lawful, who do not represent a high risk of direct or indirect involvement in money laundering and terrorist financing prevention practices;
- Implement appropriate control mechanisms, with different degrees of application according to the risk that the counterparties/transactions represent for FLOENE, that enable (i) the early identification of money laundering and terrorist financing prevention operations and (ii) the prevention of the breach of sanctions relative to money laundering and terrorist financing prevention, as issued by the competent international entity;
- Encourage the communication by its personnel of suspicious money laundering and terrorist financing activity through the use of the email [opentalk@floene.pt](mailto:opentalk@floene.pt);
- Train employees whose functions are relevant for the purposes of prevention, detection or response to the risks of money laundering and terrorist financing, taking into account, for instance, their degree of exposure.

### Final statement

FLOENE is committed to monitoring best practices in the prevention of money laundering and terrorist financing risks and to take them into consideration to achieve ongoing improvements.

Board of Directors

14/12/2017