

COSENTINO	COMPLIANCE FUNCTION	Version 1
	POLICY ON PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING	Edition: 20th May 2025

POLICY ON PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

COSENTINO, S.A.

SUPERVISED BY
Compliance Body
Date: May 2025

APPROVED BY
Board of Director
Date: June 2025

The original document, approved by the Company's Board of Directors on the date indicated above, is safeguarded by the *Compliance Body*.

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1. INTRODUCTION

Cosentino, S.A. is the parent company of the multinational group of the same name, specializing in the design, production, and distribution of avant-garde architectural and decorative solutions in various segments. As a result of significant research and development activity, the product is highly innovative and enjoys wide international recognition.

The Board of Directors of Cosentino, S.A. (jointly referred to as "**Cosentino**" or the "**Organisation**") has been legally granted the non-delegable power to determine the Organisation's general policies and strategies and, specifically, to approve and update corporate policies, which contain the guidelines governing the actions of the Company and the companies within the business group.

The integrity and reputation of Cosentino and the other Group companies may be compromised if due diligence is not carried out in identifying transactions and operations with third parties that may place Cosentino or any of its subsidiaries in a situation of risk.

The *Organisation*, which has established itself as a benchmark for its firm commitment to ethical principles and honesty, assumes the responsibility of actively participating in the challenge of combating corruption and fraud in all areas of its activity.

In this context, our *Code of Ethics, Conduct and Compliance* sets out a number of principles in relation to the prevention of money laundering which must be observed, and which give rise to this *Policy on the Prevention of Money Laundering and the Financing of Terrorism* (hereinafter the "**Policy**"). In assumption of these commitments and in the exercise of the aforementioned responsibilities, the Board of Directors of the Company approves this Policy within the framework of the law and the Company's Articles of Association and the guidelines for action in which Cosentino's corporate values are set out.

In accordance with these commitments and in the exercise of the aforementioned responsibilities, the Company's Board of Directors approves this Policy on the Prevention of Bribery and Corruption (the "**Policy**") within the framework of the law, the Articles of Association, and the guidelines that specify the corporate values of Cosentino.

In this regard, this Policy establishes the principles of action applicable to potential money laundering or terrorist financing situations in which the members of the governing bodies, managers, employees, workers or temporary employees or employees under collaboration agreements, and interns or volunteers of the Organisation (hereinafter the "**Subject Persons**" or the "**Members of the Organisation**") may find themselves.

The principles established in this Policy must be interpreted and supplemented by various internal policies and rules of the Organisation, including, among others, the Code of Ethics, Conduct and Regulatory Compliance, the General Compliance Policy, the General Criminal Compliance Policy, etc.

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The principles established in this Policy shall also apply, where appropriate, to the companies belonging to the group of companies of which Cosentino is the parent company (hereinafter the “**Group**”).

2. PURPOSE AND SCOPE

The purpose of this *Policy* is to establish a *Group*-wide compliance framework that all companies must apply in the exercise of their activities, business and relationships, both domestically and internationally, to prevent money laundering and terrorist financing, as well as to comply with the various international financial sanctions and countermeasures programmes that may be applicable.

This *Policy*, together with the *General Compliance Policy*, the *General Criminal Compliance Policy* and the *internal system for reporting* infractions and defending whistleblowers, express the firm commitment of the Organisation and the other companies of the Group to its purpose and values, to ethical principles and to the permanent monitoring and punishment of fraudulent acts and conduct or conduct conducive to corruption in any of its manifestations, which entails maintaining effective mechanisms for communication, awareness and sensitisation of all professionals and the development of a corporate culture of ethics and honesty.

This *Policy* is mandatory and applies globally to the *Organisation*. *Members of the Organisation* must comply with its contents, regardless of the position they hold and the territory in which they are located, unless the applicable legislation in the jurisdiction in which they operate establishes stricter provisions, which shall prevail over this *Policy*.

The activities affected by this *Policy* are all those that *Cosentino* carries out or may undertake in the future, in the development of its business activity. In this sense, this *Policy* applies to all areas and functions that have been carrying out these activities.

3. DEFINITIONS

- ✓ **Money laundering:** Refers to any activity related to the possession or use of funds derived from fraudulent and/or criminal activities. It includes concealing the identity of such illegally obtained funds to make them appear to have a legal origin.

For the purposes of this *Policy*, the following conduct, when committed intentionally or negligently, shall be considered money laundering:

- The conversion or transfer of any type of merchandise or goods, with the knowledge that such goods originate from illegal activities and with the aim of concealing such irregular origin or of assisting any person, natural or legal, involved in the commission of illegal activities to avoid legal consequences.
- The concealment of the true nature, source, location, disposition, movement, rights or ownership of property derived from criminal activity or from participation in such activity;

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- The acquisition, possession or use of any asset with the knowledge that such asset is derived from criminal or irregular activities.
- Participation in an association to commit or attempt to commit, or to aid, instigate, facilitate or advise in the commission of any of the aforementioned acts.
- ✓ Terrorist financing: The provision, deposit, distribution or collection of funds or goods, by any means, directly or indirectly, with the intention of using them or with the knowledge that they will be used, in whole or in part, for the commission of any of the terrorist offences defined in the applicable criminal legislation.

Terrorist financing shall be deemed to exist even if the provision or collection of funds or goods has taken place in the territory of another State.

- ✓ International financial sanctions programme: Instruments of a political, diplomatic or economic nature used by countries and international or supranational organisations with the aim of implementing restrictive measures to prevent violations of international law, human rights or civil rights and freedoms.

4. BASIC PRINCIPLES OF ACTION

The Code of Ethics, Conduct and Regulatory Compliance, in accordance with the corporate values of the Organisation, includes a series of principles and rules that must be observed by everyone in relation to the prevention of money laundering and terrorist financing.

In this regard, no commercial or business relationship should be initiated in cases where we know or suspect that it is related to funds derived from activities related to money laundering and/or terrorist financing, either directly or indirectly, or to any other criminal activity or activity contrary to applicable regulations.

For this reason, *Cosentino* must have procedures in place aimed at:

- I. Minimising the risks associated with inadvertent participation in transactions related to funds derived from money laundering;
- II. Prevent and detect dishonest practices related to money laundering by Members of the Organisation and any Third Party acting on behalf of the Company;
- III. Support Members of the Organisation in identifying suspicious situations that must be reported.

We must also be alert to any situation that could be suspicious, including:

- Payments made in a currency other than the currency of the invoice.
- Significant payments made in cash or cash equivalents.

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- Payments made from or to a bank account other than the usual bank account.
- Requests for overpayment or splitting payments into several accounts.

The main principles and standards that constitute the prevention framework regulated by this *Policy* are:

1. Risk assessment.
2. Due diligence.
3. Detection, control and examination of operations.
4. Control of sanctions lists and communication of detections.
5. Training.

1. Risk Assessment

The exposure of *Group* companies to the risks of Money Laundering, Terrorist Financing and Sanctions is directly related to the type of business or activity, the products marketed, the marketing channels, the type and characteristics of customers and/or the jurisdictions in which they operate.

In order to maintain an adequate control and prevention framework with a risk-based approach, *Group* companies must be categorised according to their level of risk so as to ensure that the highest level of supervision is applied to those companies, segments, channels, jurisdictions or products that present the highest level of risk.

2. Due Diligence

The supplier admission policy is dynamic and establishes a compliance framework at *Group* level that may vary depending on the level of risk of certain segments or activities as derived from their exposure to risk at any given time. The admission policy must comply with international standards and the “*Know Your Supplier*” principle (also known by its acronym KYS) with a special focus on ensuring that a good understanding of the supplier and its activities is available at all times.

The *Know Your Supplier* principle and due diligence policies shall always be applied with a risk-based approach and shall ensure that the measures applied are appropriate to the underlying risk of money laundering, terrorist financing or sanctions.

3. Detection, control y examination of operations

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The companies of the *Group* must have means for detecting, controlling and examining transactions. These means shall be applied according to the risk and shall in all cases cover the three basic types of transaction detection:

The detection of suspicious transactions shall entail a detailed and comprehensive analysis aimed at determining the actual existence of indications of money laundering and terrorist financing. This analysis shall in all cases be centralised in a single unit common to all companies in the *Group*, with the *Organisation's* Compliance Body being responsible for conducting the investigation.

4. Control of sanction lists and reporting of detections

In order to comply with the restrictions imposed by Sanctions Programmes, *Group* companies must:

- Identify and follow the Sanctions Programmes established by the United Nations (UN), the European Union (EU), OFAC and local programmes applicable in the jurisdictions in which Group companies operate.
- Assess the risks associated with activities related to Sanctions Programmes in order to determine the risks of participating or engaging in activities restricted or prohibited by the Sanctions;
- Refrain from executing or participating in operations or transactions with sanctioned persons;
- Comply with prohibitions and restrictions on the execution of transactions, payments or commercial relations and refrain from executing them when they involve a breach of the Sanctions Programmes;
- Freeze assets and funds when required by the Sanctions Programmes and notify the authorities administering the Sanctions Programmes of such circumstances;
- Implement internal control procedures and prevention mechanisms to ensure adequate compliance with the obligations of the Group companies.

5. Training

Raising awareness of the risks associated with these crimes is a key element in the prevention of money laundering and terrorism.

The *Organisation* shall define, maintain and implement training programmes for its employees to ensure an adequate level of awareness among all staff, as required by law, and shall establish policies to ensure mandatory training on money laundering prevention, terrorist financing and sanctions for all its personnel (including senior management and Boards of Directors) on a regular basis and appropriate to the level of risk exposure of their activity within the company.

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6. COMMUNICATION CHANNELS

The *Group* companies have set up an appropriate channel for members of their management bodies, professionals, suppliers and other third parties specified in the regulations to report possible irregular conduct or potential illegal or unlawful acts that relate to or affect the scope of their respective activities, including, in particular, potential fraudulent acts and conduct or acts that encourage corruption in any of its forms.

This channel is integrated into the *Group's* internal information system in accordance with the provisions of the *Policy of the internal information system and whistleblower protection*, and is the preferred channel for reporting such conduct and acts and for processing any complaints or information submitted.

Although compliance with all provisions of this *Policy* is the responsibility of each Member of the *Organisation*, any query or incident related to the content of this *Policy* must be reported immediately to the Compliance Body, in accordance with the *Organisation's Internal Information System Policy and Procedure*, through the Ethics Channel at the following link <https://www.cosentino.com/ethical-channel/>; or via the email address ethics-channel@cosentino.com.

From that moment, the Compliance Body will contact the informant and take the necessary or appropriate actions or precautions (preventive and/or reactive) to manage the situation reported.

7. DISCIPLINARY SYSTEM

This *Prevention on Money Laundering and Terrorism Financing Policy* must be applied comprehensively and preventively, as it aims to prevent the occurrence of any situation or circumstance that could constitute a potential legal offence.

In this regard, failure to comply with the provisions of this *Policy*, as well as with the rest of the internal and external regulations applicable to *Cosentino*, may result in the application of the appropriate disciplinary measures, in accordance with the labour legislation applicable in each of the countries where the *Organisation* operates, without prejudice to any other liabilities that the offender may have incurred.

Finally, it shall be the responsibility of the Audit and Control Committee to ensure compliance with this *Policy*.

8. COMMUNICATION AND UPDATE

This *Policy* and its updates are delivered to all members of *Cosentino*. It will also be communicated to third parties when necessary to comply with the values and commitments undertaken, and to extend the *Organization's* compliance culture in its relationships with them.

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The Compliance Director - CCO supervises the implementation of this *Policy* and the CCMs to ensure their validity and updating, as well as their effectiveness in relation to the commitments assumed in this *Policy* and in each CCM.

The corresponding Board of Director, informed by the Compliance Director - CCO, will always make the necessary decisions to ensure the fulfilment of the commitments undertaken.

Likewise, the Board of Directors of Cosentino, S.A. commits to monitoring the effectiveness of this *Policy*, updating it as deemed appropriate.

9. ENTRY INTO FORCE

This *Policy* shall enter into force on 1st July 2025.