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	PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING POLICY	Page 1 of 2 01/01/2025

Aguilar de Campoo, January 1, 2025

1. PURPOSE

Galletas Gullón, S.A. and its subsidiaries (hereinafter referred to as “**Galletas Gullón**”) shows its firm commitment to the prevention of money laundering and terrorism financing, and also expresses its firm willingness to cooperate with the relevant authorities.

Financial crime is a universal and globalized phenomenon that uses the disappearance of trade barriers and the internationalization of the economy to materialize. A coordinated response is therefore required to prevent payment and collection mechanisms from being used inadvertently and involuntarily for illicit purposes.

The purpose of this Policy is to establish, in accordance with international standards on the subject, the criteria to prevent Galletas Gullón from being used in the execution of any money laundering and/or terrorist financing operations through a proactive framework programme in which the principles and guidelines that Galletas Gullón must follow are established.

To this end, the following procedures shall be implemented: (i) a compliance framework at Company level applicable in the exercise of its activities, both nationally and internationally, to prevent money laundering and terrorist financing; (ii) define responsibilities in this area; (iii) establish the governance framework.

For the purposes of this framework the following definitions are established:

- Money laundering: acquisition, use, conversion or transfer of assets derived from criminal activities or from participation in them, to hide or conceal their origin or to assist the person involved in the criminal activity in avoiding the legal consequences of his/her actions. Laundering operations are also considered to be those consisting of concealing or disguising their true nature, origin, location, disposition, movements, or the ownership or rights over them, even when the activities that generate them are carried out in the territory of another State.
- Terrorism financing: supply, deposit, distribution or collection of funds or goods, by any means, directly or indirectly, with the intention to use them or with the knowledge that they will be used, in whole or in part, for the commission of any of the terrorist offences established in the Criminal Code. Terrorist financing shall be considered to exist even if the supply or collection of funds or goods has taken place in the territory of another State.

This Policy is developed and supplemented through the other policies and procedures of Galletas Gullón and the Code of Conduct.

2. SCOPE

This Policy applies to all companies of Galletas Gullón.

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3.- COMMITMENT

Galletas Gullón is firmly committed to comply with and enforce the applicable laws at all times and places, and specifically in relation to the prevention of money laundering and terrorism financing, maintaining due diligence regarding the prevention, detection and communication of any conduct, irregular action or its mere attempt, on said specific cases.

Therefore, the company shall implement organizational, technical and disciplinary measures to ensure, and where possible guarantee, effective internal control. These procedures should ensure an adequate and continuous monitoring of the business relationship with the aim of adapting the level of risk and, therefore, the measures to be applied.

Taking into account the activity that Galletas Gullón carries out, this Policy mainly focuses on the identification and analysis of suppliers and customers when making payments and collections, both national and international, with special attention to those collections and payments that could have their origin or destination in tax havens or in countries that could be included in OFAC sanctions lists.

This Policy has been reviewed and approved by the CEO on behalf of the Board of Directors of Galletas Gullón on January 1st, 2025.

Juan Miguel Martínez Gabaldón
CEO and General Director