

POLITICS FRATELLI CALEGARO S.RL.

ANTI-MONEY-LAUNDERING AND FINANCING OF TERRORISM

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Money laundering means as defined by the **1998 UN Convention against Drug Trafficking**, and consisting of each of the following activities:

- a. The conversion or transfer of assets, carried out with knowledge that they originate from a criminal activity or participation in such an activity, for the purpose of concealing or disguising the illicit origin of the goods themselves or to help any person involved in such activity to escape the consequences of his actions;
- b. Concealment or concealment of the real nature, provenance, location, disposition, movement, ownership or rights to assets which are known to be derived from criminal activity or participation in such activity;
- c. The purchase, possession or use of property knowing at the time of receipt that it is derived from a criminal activity or participation in such an activity;
- d. Participation in any of the acts referred to in the above letters, association to comment on such act, attempt to commit it, aiding, abetting or inducing a person to commit it or facilitating its execution.

Recycling is usually a 3-stage process:

- **Introduction:** the proceeds of crime, even not negligent, through a series of operations are collected and placed in financial and/or non-financial institutions;
- **Stratification:** is implemented by the completion of a series of complex financial operations, even if not linked together, designed to hinder the reconstruction of financial flows;
- **Employment:** the proceeds of criminal activity in the legal economy are used in such a way that they appear formally of legal origin.

1

The 3 stages are not static and may overlap: use of financial institutions for criminal purposes can occur in any of the above stages.

Financing of terrorism means any activity that is directed, by any means, collection, stockpiling, brokering, depositing, custody or delivery of funds or economic resources, in whatever manner, intended to be used in whole or in part for the purpose of committing one or more terrorist offences or, in any event, to facilitate the commission of one or more criminal offences under the Penal Code, This is regardless of the actual use of funds and economic resources for the commission of the above-mentioned crimes.

GUIDELINES

Within the RJC **COP 2019 standard**, it is necessary to rely on "**Know Your Counterparty (KYC)**" in order to combat **money laundering and terrorist financing**, for this reason, the company **Fratelli Calegario S.r.l.** has asked its suppliers **to fill out the questionnaire "KYC"** and the reference policy, in order to identify the companies/organizations with which the company has dealings, to understand the legitimacy of their business relations and within reasonable limits, To identify and react promptly to unusual or suspicious patterns.

The corporate policy of **Fratelli Calegario S.r.l.** for the problems of money laundering and terrorist financing includes prevention activities, specifically:

- Involvement of all employees, contractors, suppliers and customers;
- Control of transactions;
- Rigour and analysis of suspicious transactions;
- Audit and training activities;
- Prevention of commercial interests.

The prevention of money laundering has an important and strategic role at a company level for **Fratelli Calegario S.r.l.** in the adoption of criminal phenomena and is based on the following principles:

- Verification of its suppliers/customers - using Due Diligence policies as guidelines;
- Storage of data, for at least 5 years, relating to continuing and non-continuing employment relationships;
- Appropriate organisational procedures for internal control;
- Reports of suspicious transactions