

# Corporate Anti-Money Laundering and Counter-Terrorist Financing Policy





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# 1. Purpose

This Corporate Anti-Money Laundering and Counter-Terrorist Financing Policy (“the Policy”) is an integral part of the Sener Group Compliance System, giving effect to the Corporate Anti-Corruption Policy<sup>1</sup>, which establishes zero tolerance toward conduct that may constitute corruption in relationships between the Sener Group and third parties<sup>2</sup>.

In this regard, its objective is to establish the principles, guidelines and procedures that enable the prevention, identification, communication and adequate management of the risks of money laundering and terrorist financing that may arise in the performance of the Sener Group’s activities, ensuring compliance with applicable regulations and the adoption of effective measures to mitigate such risks.<sup>3</sup>

Sener understands that the best way to fulfil its commitment to prevent money laundering or terrorist financing within its operations is to establish effective internal rules and procedures to:

1. Carry out its activities in accordance with strict ethical rules and the laws in force in each jurisdiction in which it operates.
2. Implementing rules of conduct and control and communication systems to prevent Sener’s own activities within the framework of its business from being used for money laundering or terrorist financing.
3. Ensuring that its employees comply with its internal regulatory framework, basically policies and procedures, including Sener’s own Code of Conduct.<sup>4</sup>
4. Strictly comply with anti-money laundering and counter-terrorist financing laws, as well as with the recommendations issued in this area by national and international authorities.

This Policy constitutes a commitment to ongoing vigilance regarding possible acts and conduct that could lead to money laundering and terrorist financing, as well as a commitment to communication and awareness-raising among all members of the Sener Group and to the development of a corporate culture of ethics and honesty. It is mandatory to report any acts or conduct that violate or potentially violate this Policy, when there is reasonable evidence of such violations.

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<sup>1</sup> See Grupo Sener’s Anti-Corruption Corporate Policy on the Grupo Sener corporate website.

<sup>2</sup> That is, any natural or legal person, public or private, including, but not limited to, customers, partners (e.g. in joint ventures and/or temporary business associations), suppliers, subcontractors, agents, advisors, national or international regulatory bodies, governments, public administrations, civil servants or public employees, persons who otherwise exercise public functions, political parties and candidates for public office.

<sup>3</sup> Without prejudice to the laws applicable in each jurisdiction in which the group companies operate, this policy is based on Law 10/2010 on the prevention of money laundering and terrorist financing and on the recommendations issued in this area by national and international authorities, such as the Financial Action Task Force (FATF).

<sup>4</sup> See Code of Conduct on Sener’s corporate website.

This Policy is also a call to all members of the Sener Group, and especially to those with management, supervisory and team coordination responsibilities, to maintain exemplary behaviour in this area at all times.

It also constitutes a preventive measure against actions that could constitute any form of irregular behaviour or potential crime in any jurisdiction in which the companies of the Sener Group operate.

## 2. Scope of application

This Policy is directly and mandatorily applicable to all companies of the Sener Group and all its people, collectively referred to as Sener, the Sener Group, or the Group.

Sener Group companies include all subsidiary companies, including international subsidiaries, in which Sener directly or indirectly holds management control<sup>5</sup> at present or in the future. Individually, references to Sener Group people include all members of the governing bodies of Sener Group companies and all their directors, officers, employees and equivalent personnel, regardless of their contractual arrangement, geographical location or hierarchical level.

As a general principle, the Sener Group will promote the adoption of principles and values equivalent to those set out in this Policy among the third parties with which it operates, and among suppliers, subcontractors and collaborating companies.

The Sener Group will also promote the alignment of its internal procedures with the basic principles developed in this Policy, as well as with the procedures applied by other related companies that are not part of the Group, such as minority shareholdings, joint ventures and temporary business alliances.

## 3. Definitions

For the purposes of this Policy, and without prejudice to the specific provisions of the applicable regulations in this area:

**Money laundering:** operations involving assets derived from criminal activities aimed at concealing or disguising their illicit origin.

**Terrorist financing:** directly or indirectly providing funds or assets with the intention or knowledge that they will be used to commit terrorist acts.

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<sup>5</sup> 'Control' refers to a situation in which a company directly or indirectly holds the majority of voting rights of another company, has the power to appoint or remove the majority of members of its governing body or can exercise the majority of voting rights pursuant to agreements with third parties, thereby effectively controlling the management of such company.

## 4. Principles of conduct

The Sener Group is committed to acting with integrity, transparency and diligence in all its operations, adopting a zero-tolerance stance towards money laundering and terrorist financing.

To this end, the following principles of action shall apply:

- a. **Know Your Third Parties:** applying due diligence to understand those with which Sener maintains or intends to maintain business relationships.
- b. **Internal Controls:** implementing preventive measures, supervision, risk management and communication mechanisms.
- c. **Reporting and Cooperation:** reporting suspicious transactions to competent authorities and cooperating fully.
- d. **Abstention:** refraining from carrying out suspicious operations.
- e. **Continuous Training:** ensuring the People receive adequate and ongoing training.

Only with the commitment of all individuals can it be ensured that the activities of the Sener Group do not constitute a vehicle for money laundering or terrorist financing in any jurisdiction in which the companies of the Sener Group operate.

## 5. Control measures

### **Corporate structure for powers of attorney for bank payments**

The Sener Group's Treasury and Financial Planning department has defined a robust structure for the delegation of powers, which complies with the applicable requirements and have been formalised in accordance with procedures that guarantee greater legal certainty, in accordance with the regulations applicable in each case to the group's companies, ensuring internally and vis-à-vis third parties that the authorised persons are the correct ones in accordance with the provisions of that power of attorney matrix.

The powers of attorney thus formalised, which include the powers to make bank payments, are sent to the financial institutions each time a change occurs, and it is the responsibility of the Sener Group's Treasury and Financial Planning department to communicate this to the banks. Once a year, a complete review of the Sener Group's powers of attorney is carried out to ensure that the attorneys-in-fact for all open accounts are up to date.

### **Tax Havens**

As part of this Policy, Sener strictly prohibits making payments to bank accounts opened in tax havens or sanctioned countries, as well as accepting payments from such territories. To this end, the Treasury and Financial Planning department will maintain an up-to-date

list of countries that are considered tax havens or are subject to international sanctions. It will also collaborate with the financial or payment institutions with which the Sener Group works to identify any payments that may originate from bank accounts located in territories considered to be tax havens.

### **Prohibited customers, partners, suppliers or agents**

For reasons of money laundering and terrorist financing risk control, Sener will not accept the following categories of customers, partners, suppliers and/or agents, or, in any case, more restrictive measures will be required for their acceptance:

- I. Individuals/companies included in any of the official global sanctions lists.
- II. Individuals/companies about whom there is information<sup>6</sup> suggesting that they may be involved in criminal activities.
- III. Individuals/companies whose business activities make it impossible to verify the legitimacy of their activities or the origin of their funds.
- IV. Individuals/companies who refuse to provide the required information or documentation.
- V. Companies whose shareholding or control structure cannot be determined.
- VI. Financial institutions resident in countries or territories where they have no physical presence (also known as ‘shell banks’) and which do not belong to a regulated financial group.

### **Measures applied in payment management**

All payments listed in the annex to this Policy shall be considered payments.

No cash payments of any kind will be permitted in Sener Group companies.

No payments may be made to any supplier or subcontractor that has not been previously approved in accordance with the procedures developed by Sener for this purpose and is listed as such in Sener’s master list of suppliers and subcontractors.

No payment shall be authorised without the corresponding invoice having been received by the designated Sener Group personnel and without it having been approved by the authorised persons in accordance with internal procedures and recorded in the system.

Sener always includes the form and method of payment in the contracts it signs with its suppliers and subcontractors. Whenever the agreed form of payment is by bank transfer, the contract will specify the details of the bank account into which the agreed payments are to be made in consideration for the performance of the work or the provision of the services. Suppliers are required to provide a valid bank account certificate in advance, both for registration as a supplier and subsequently for any change of bank account. If it is necessary to change a bank account, the supplier shall notify Sener in the manner provided for in the contract. As with any contractual modification, the aforementioned notification must be authorised by persons with sufficient legal representation to do so. This prevents payments from being made to a bank account other than the one reported by the supplier or subcontractor.

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<sup>6</sup> In most cases, it will be provided as a result of the screening process carried out on international databases by the Sener Group’s corporate Compliance department (Third-Party Compliance).

## Measures applied in payment management

Under no circumstances will cash payments be accepted by Sener Group companies. Only payments made through banks via cash deposits, transfers, cards, cheques, etc. will be accepted. All payments received must originate from an invoice issued by Sener and be duly recorded in the system.

Sener includes in the contracts it signs with its clients, by default, that the agreed form of payment is by bank transfer and the details of the bank account into which the agreed payments for the execution of its work or the provision of services are to be made. If it is necessary to change a bank account, Sener will notify the customer in the manner provided for in the contract. As with any contractual modification, the aforementioned notification must be authorised by those persons with sufficient legal representation of the Sener Group to do so.

For other collection instruments (such as cheques or promissory notes), the Treasury and Financial Planning department will decide the financial institution in which said instrument will be deposited for collection, which, under no circumstances, will be located in a tax haven. Sener does not maintain and will not maintain accounts open in tax havens.

If the collection comes from a financial institution other than the one specified in the contract, this circumstance must be duly justified and approved by the financial institution and by Sener's Treasury and Financial Planning Department.

## Corporate control measures:

- a. Development and implementation of corporate procedures for treasury operations and control.  
Implementation of treasury tools that provide security and greater control over the group's collection and payment operations.
- b. Continuous updating of mandatory compliance standards and other relevant regulations applicable to persons involved in daily collection and payment transactions.  
Prior identification and verification—by Legal Counsel—of the true identity of customers, partners, agents, suppliers, and subcontractors, whether individuals or legal entities, who will collaborate or interact with Sener in the course of its operations.
- c. Due diligence of third parties -by the Compliance Department- to identify individuals and legal entities that have been sanctioned or investigated for these reasons.
- d. Registration and retention of all relevant documentation for the legally required periods.
- e. Regular training for all persons on the prevention of criminal offences, including money laundering and terrorist financing.
- f. Implementation of an Internal Information System called the Sener Ethics Line as a confidential reporting channel for the purpose of identifying, preventing and stopping operations related to money laundering or terrorist financing and making the reports required by applicable laws.
- g. Internal Audit review to verify compliance with this Policy and the controls established

in the procedures defined by the Treasury and Financial Planning department.

- h. Supervision by the Compliance department of the proper functioning of the Sener Group's internal controls defined against money laundering and terrorist financing.
- i. Communication/reporting of suspicious activities to the competent authorities in accordance with applicable legislation.

## 6. Governance

### 6.1 Integration into the Compliance System

This Corporate Anti-Money Laundering and Counter-Terrorist Financing Policy is an integral part of the Sener Group Compliance System<sup>7</sup> giving effect to the principles set out in the Code of Conduct<sup>8</sup> and complementing the policies that are part of it and the internal procedures that develop them, as well as the principles established in the Sener Group's Crime Detection and Prevention Models.

References in this document to the Sener Group Code of Conduct also extend to the complementary and/or implementing policies and procedures inferred from its context.

### 6.2 Duty to report

Without prejudice to the specific reporting obligations established in this Policy, all Sener Group People must, in good faith, report the existence —or, where they have reasonable grounds, the possible existence— of any non-compliance, conduct contrary to or violation of the principles and criteria of action established in the Compliance System, and in particular in this Policy.

Reports, which may be anonymous, must be made through the procedures and channels established for this purpose in our Compliance System, through which inquiries may also be submitted regarding the matters covered and their application. To this end, Sener Group companies have an Internal Reporting System called the 'Ethics Line'<sup>9</sup>. Through this channel, confidentiality, anonymity and an anti-retaliation policy for whistleblowers and reported parties are guaranteed for all communications. The Ethics Line<sup>10</sup> is accessible from the corporate website and from the Sener Group Intranet —Compliance area— 24 hours a day, 7 days a week.

A Compliance Officer has also been appointed in each Sener Group company to whom communications or inquiries may be addressed directly. The Compliance Officer is responsible for handling reports and/or inquiries received, giving priority to those related to breaches or violations of internal anti-corruption policies and procedures,

<sup>7</sup> See the Compliance area on the Sener Group's corporate website.

<sup>8</sup> See the Sener Group's Code of Conduct on the Sener Group's corporate website.

<sup>9</sup> In accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law; and Law 2/2023 of 20 February regulating the protection of persons who report regulatory infringements and the fight against corruption.

<sup>10</sup> See the Sener Group Ethics Hotline Regulations. The Ethics Hotline can be accessed via the Ethics Hotline Form on the home page of the corporate website and also via the Sener Group intranet

and respecting in all cases the legal maximum timelines for acknowledging receipt, analysing, investigating and resolving reported situations. Subsequently, the Compliance Officer will carry out the appropriate actions and verifications in accordance with the internally defined procedure in order to respond to the facts reported.

### **6.3 Awareness, communication and training**

All Sener Group personnel are required to be familiar with, understand and comply with the Compliance System, and in particular with this Policy, and to actively participate in the training programmes and oversight mechanisms established.

Depending on their geographical location, position and/or functions, personnel are also required to be familiar with, understand and comply with the regulations applicable in the jurisdictions in which the different Sener Group companies operate. The Compliance System, and in particular this Policy, constitutes a minimum standard and therefore applies without prejudice to any laws that may be applicable. For the avoidance of doubt, compliance with the Compliance System will under no circumstances excuse non-compliance with the law.

This Policy, together with the other documents part of the Sener Group Compliance System, will be published on the Sener Group corporate website and on its intranet.

The Compliance area is ultimately responsible for ensuring the proper dissemination of this Policy and the Compliance System, ensuring that they are communicated internally to all personnel and externally to the relevant stakeholders.

Notwithstanding the foregoing, individuals performing management, supervisory or team coordination functions bear enhanced responsibility for promoting a culture of compliance and acting as role models in the application of the Compliance System, ensuring that the personnel under their responsibility receive the necessary training and guidance.

### **6.4 Oversight and disciplinary regime**

Ultimate responsibility for oversight and compliance with this Policy rests with the governing body of each Sener Group company, which delegates such oversight to the appointed Compliance Officer. This responsibility requires particular diligence in international subsidiaries through which the Sener Group operates in other countries.

Any breach, misconduct or violation of the principles and criteria of conduct contained in the Compliance System, and in particular in this Policy, may result in the adoption of the applicable disciplinary measures and sanctions in accordance with the relevant disciplinary regime, without prejudice to the adoption of other measures or the assertion of any liabilities that may apply to the offender.

The Sener Group undertakes to take appropriate measures in response to any irregular or potentially criminal conduct that may arise in the course of its operations, including, where appropriate, informing the competent authorities and initiating the relevant legal actions.

## 7. Revisión y actualización

The Sener Group's Compliance area will regularly review the content of this Policy, ensuring that it contains the international best practices, recommendations and legislation in force at any given time. It will propose amendments and updates that contribute to its development and continuous improvement.

The Board of Directors of Sener Grupo de Ingeniería, S.A. has the ultimate authority to approve the corporate codes and policies at Group level. These contain the guidelines that govern the actions of all Sener Group companies in the implementation of the Code of Conduct and in line with its corporate governance principles.

This Policy was approved by the Board of Directors of Sener Grupo de Ingeniería, S.A. on 18 December 2025.

## Annex: Types of payments covered by this Policy

Category	Payment description
Operational Payments	Salaries
Operational Payments	Social Security (company contributions)
Operational Payments	Travel expenses
Operational Payments	Payments to suppliers of goods and services
Operational Payments	Rental of offices, premises or warehouses
Operational Payments	Utilities (electricity, water, gas, internet, telephone)
Operational Payments	Transport and logistics costs
Operational Payments	Professional services (consulting, auditing, legal, etc.)
Operational Payments	Maintenance and repairs
Operational Payments	Software licenses and subscriptions
Tax and Legal Payments	VAT (monthly or quarterly)
Tax and Legal Payments	Personal income tax withheld from employees and professionals
Tax and Legal Payments	Corporate Income Tax
Tax and Legal Payments	Municipal and regional taxes
Tax and Legal Payments	Fines or administrative penalties (if applicable)
Financial Payments	Interest on loans
Financial Payments	Loan repayment
Financial Payments	Bank fees
Financial Payments	Leasing or renting payments
Financial Payments	Dividends to partners or shareholders
Investment Payments	Purchase of machinery, equipment or vehicles
Investment Payments	Acquisition of real estate
Investment Payments	Investments in technology or software
Investment Payments	Product development or R+D
Investment Payments	Commercial expansion (new headquarters, franchises, etc.)
Extraordinary Payments	Severance payments
Extraordinary Payments	Payments for litigation or legal settlements
Extraordinary Payments	Donations or sponsorships
Extraordinary Payments	Acquisitions of companies or shares



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