

ANTI-MONEY LAUNDERING PROGRAM

This Compliance Program is intended to establish the appropriate procedures for compliance and collaboration with anti-money laundering legislation in order to hinder or prevent QUADPACK from being used for these purposes.

The Program is aimed at developing procedures and controls that detect, prevent and impede collaboration with individuals involved in money laundering activities and to prevent them from using QUADPACK for such purposes.

MONEY LAUNDERING INCLUDES:

- The conversion or transfer of assets (of any kind, tangible or intangible, liquid or not, including electronic transactions) knowing they originate from criminal activities with the intention of hiding their origin or ownership.
- The hiding of the origin, location, movement or ownership of these assets.
- The acquisition or use of these assets and the disposal thereof.
- Direct or indirect participation, in all of the foregoing activities.