



*WMC*

Anti-Money  
Laundering Policy

# Anti-Money Laundering Policy

Effective date: 1 December 2022

Review period: Every two years

Version: 1 (Approved 1 December 2022)

Policy owner: Compliance Officer

Related document(s): Code of Conduct, Know Your Customer Policy

Public document: Yes

## 1.0 POLICY STATEMENT

1. WMC will only conduct business with customers and third parties (including but not limited to contractors and intermediaries) who are involved in legitimate business and whose funds are obtained through legitimate sources.
2. WMC complies with all applicable anti-money laundering and counter-terrorism financing laws in its operations worldwide.

## 2.0 EXECUTIVE SUMMARY

The purpose of WMC's Anti-Money Laundering Policy (AML Policy) is to establish a general framework against money laundering and terrorism financing. WMC has a zero-tolerance approach to money laundering and is committed to the highest standards of anti-money laundering/counter-terrorism financing. This AML Policy provides further details to WMC Code of Conduct with regard to anti-money laundering compliance.

All WMC employees and third parties acting on behalf of WMC should remain alert to money laundering and terrorism financing risks and should promote awareness and compliance especially when working with third parties that are evaluated as high risk.

## 3.0 SCOPE

This policy is applicable to all of WMC's employees and third parties acting on behalf of WMC (Personnel).

## 4.0 PROCEDURES

### 4.1 Risk Assessment and Know Your Customer (KYC)

To mitigate the risks of money laundering and terrorism financing, WMC has established a KYC process as set out in the KYC Policy; this process requires performing due diligence on each counterparty that WMC intends to enter into a business relationship with, in order to identify and mitigate any potential risks. Periodic, risk-based reviews will be carried out to ensure that documents, data and information on the counterparty are kept up to date (see KYC Policy for further information).

### 4.2 Training and Awareness

Training is available for Personnel regarding compliance of this policy upon request.

This policy will be provided to Personnel and made available on the WMC Intranet.

### 4.3 Monitoring and Reporting

This policy is regularly monitored by the Compliance Officer.

Following an incident or complaint, the Compliance Officer will report to the WMC Board with an update and recommended action on how best to proceed and/or how best to develop preventative measures for future.

## 5.0 DEFINITIONS

**PERSONNEL** WMC employees and third parties acting on behalf of WMC.

**WMC** WMC Energy B.V. and its affiliates.

## 6.0 POLICY VIOLATIONS

WMC Personnel who violate this policy, or do not report violations of this policy, will be subject to appropriate disciplinary measures which could include legal action and/or termination of employment or contract.

To report non-compliance (or suspected non-compliance) of this policy, please contact the Compliance Officer—who will evaluate what action is required and appropriate.

## **7.0 OTHER**

### **7.1 Related Information**

Additional information regarding WMC's values and guidelines on the acceptable behaviours of its Personnel is provided in further detail in WMC's Code of Conduct.

Information regarding the KYC Policy is available on WMC's Intranet.

Questions or comments pertaining to this policy may be directed to the Personnel's manager and the Compliance Officer.

### **7.2 Policy History**

Version 1      Effective 1 December 2022