

Anti-Money Laundering Policy

Date of inception:	1 December 2022
Review frequency:	Every two years
Approval date:	10 February 2025 (Version 2)
Policy owner:	Compliance Officer
Related document(s):	Code of Conduct, Know Your Customer Policy
Public document:	Yes

1. Policy Statement

WMC will only conduct business with customers and third parties (including, but not limited to, contractors and intermediaries) who operate legitimate businesses and whose funds are obtained through legitimate sources. WMC is committed to complying with all applicable anti-money laundering and counter-terrorism financing laws across its operations worldwide. This commitment underscores WMC's dedication to maintaining the highest standards of integrity and transparency in all its dealings.

1. Purpose

The purpose of this policy is to establish a general framework for preventing, detecting and responding to money laundering and terrorism financing risks. WMC has a zero-tolerance approach to money laundering and is committed to the highest standards of anti-money laundering (AML)/counter-terrorism financing (CTF) compliance across its operations.

To uphold this standard, all WMC Personnel are required to remain vigilant to money laundering and terrorism financing risks, promote awareness and adhere to AML and CTF obligations. Particular attention must be given when engaging with third parties that are evaluated as high risk.

2. Scope

This policy is applicable to all of WMC's Personnel.

Capitalized terms used herein shall have the meanings ascribed to them in Section 6.

3. Procedures

3.1 Risk Assessment and Know Your Customer (KYC)

To mitigate the risks of money laundering and terrorism financing, WMC has established a robust KYC process, detailed in the KYC Policy. This process requires performing due diligence on each counterparty that WMC intends to enter into a business relationship with, to identify and mitigate any potential risks effectively. The KYC process involves a review of, among others, the following risk factors, which relate to money laundering and terrorism financing:

- whether the counterparty has been convicted of or investigated for fraud, misrepresentation, bribery, corruption, money laundering, terrorism financing, tax evasion or similar offences, or is included on any sanctions lists;
- the jurisdiction(s) in which the counterparty is registered, banks and conducts business, with particular attention to high-risk regions;
- whether the counterparty uses offshore or complex structures or shell companies that obscure ownership or its source of funds.

Senior WMC Personnel overseeing an agreement or project involving a new counterparty must ensure that the KYC process is initiated for such counterparty and that all required documentation is submitted in accordance with the KYC Policy. They are also responsible for raising any new concerns or information that may arise regarding the counterparty that could affect the assessment of the risk factors outlined above.

3.2 Other Actions

WMC Personnel must remain vigilant for signs of suspicious transactions or behavior, such as a reluctance of a counterparty to provide information, unusually large cash transactions, or other irregularities that may indicate potential money laundering or terrorism financing activities. Any such suspicions must be promptly escalated internally to the Compliance Officer, who will assess the situation and determine whether to report the matter to the relevant authorities.

Senior WMC Personnel responsible for agreements or projects with counterparties, must ensure that contracts include AML and CTF law compliance provisions.

3.3 Training and Awareness

Training on this policy and its contents is provided to WMC Personnel at the discretion of the Compliance Officer (which will include regular periodic training as well as training upon the occurrence of any significant compliance incidents).

Additional training is available for WMC Personnel upon request.

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

3.4 Monitoring and Reporting

This policy is regularly monitored by the Compliance Officer.

Following an incident or complaint, the Compliance Officer will conduct an investigation and provide the WMC Board with a report, including findings, recommended actions, and preventative measures to mitigate future risks.

4. Policy violations

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.

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 their employment or contract.

5. Other

5.1 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 Compliance Officer.

5.2 Policy History

Version 1 Effective 1 December 2022

Version 2 Effective 10 February 2025

6. Definitions

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

WMC WMC Group B.V. and its affiliates.