



11. MONEY LAUNDERING

At HMC, we endorse internal and external rules that safeguard a responsible way of working. As an HMC employee, you also carry this responsibility. You are therefore expected to act in line with our policies and applicable anti-money laundering laws.

What is money laundering?

Money laundering is the process of making illegally obtained money appear to be legal. It involves transferring money in elaborate and complicated ways, with the intention to mislead anyone who wants to trace the transaction.

If money laundering is left unchecked, organized crime can infiltrate financial institutions and acquire control of large sectors of the economy. Money laundering supports criminal activity, including drug trafficking, terrorism and corruption. At HMC, we do not wish to contribute to any of these criminal activities and we will never knowingly help launder money.

EXAMPLES

Examples of money laundering

- A drug cartel launders money by investing it in an offshore company.
- A shipping company pays personnel in cash with money obtained by means of transporting illegal products.

Points of attention

The following is a list of possible warning signals that may arise during the course of your work. The list is not intended to be exhaustive and is for illustrative purposes only.

Pay special attention when:

- You are asked to make a payment to an unverified bank account.
- A client requires you to make payments in cash or other unusual banking arrangements.
- You feel you cannot be transparent in descriptions when transferring money.
- A client makes payments in small amounts via various bank accounts.

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KEY TAKEAWAYS

- Have a clear picture of the ownership of the companies you are working with. Determine whether the owners have been sanctioned and whether they have been convicted of criminal activities in the past.
- If you are a budget holder, make sure you can back up your payments with proper documentation (e.g. receipts).
- Pay attention if someone attempts to make or receive payments in cash or in other unusual banking arrangements.
- Participate in anti-money laundering training as determined by the Ethics & Compliance department and understand the risks you face at work.
- Please note that failure to comply with this policy can be reason for disciplinary action.

What does this mean for third parties?

At HMC, we want to make sure third parties are reputable, capable and commercially reliable companies. Therefore:

- We ask third parties to certify that all goods and services supplied to HMC comply with our anti-money laundering policy and applicable laws.
- If we feel it is necessary, we monitor their behavior and end our relationship with any third party who fails to comply with this policy.

Do you have any questions about this topic?

We encourage you to contact the Ethics & Compliance department. The contact details can be found on the Ethics & Compliance intranet site.

Speak up!

A transparent way of working is vital for fighting money laundering. If you suspect misconduct, please take a look at the Reporting Policy to see what you can do.