



# Accelya Prevention of Money Laundering and Financing of Terrorism Policy

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## Revision History

Version	Date	Amendments	Author	Approver
0.1	July 2019	First version	Robert Wilson	
0.2	January 2024	Update for new branding	Laurent Mather	Robert Wilson
0.3	January 2025	Minor amendments	Laurent Mather	ESG Team
0.4	January 2026	Minor amendments	Laurent Mather	ESG Team

## Security Classification

Select one	Level	Definition
<input type="radio"/>	<b>Public</b>	Information that may be broadly distributed without causing damage to the organization, employees and stakeholders.
<input checked="" type="radio"/>	<b>Internal</b>	Information that can be distributed within the company.
<input type="radio"/>	<b>Confidential</b>	Sensitive information available within a group of people which must not be disclosed outside the organization without explicit permission of document owner.
<input type="radio"/>	<b>Highly Confidential</b>	Highly sensitive and critical information meant for a limited group which must not be disclosed outside the organization without explicit permission of document owner.



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# 1. Purpose, Concepts and Regulatory Framework and Scope

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## Purpose:

There is increasing concern in the international community regarding the threat posed by money laundering and the financing of terrorism.

## Concepts and regulatory framework

- Money laundering is a type of criminal activity that consists of concealing the origin of funds or assets obtained in an unlawful manner, such that those funds or assets appear to have a legitimate source. These criminal activities have serious economic and legal repercussions, because they allow criminals to then legally make use of the profits they have gained from their criminal acts by obscuring the origin of the related funds or assets.
- Financing of terrorism consists of providing money that is used to perform terrorist acts, or to pay for costs related to them. Financing of terrorism shares many of the attributes of money laundering, since terrorists use similar channels or methods to hide the source of the funds they have obtained, even though in this case those sources may be either legal or illegal. Because of this, the legal and regulatory system used to prevent and impede the financing of terrorism makes use of the same procedures and measures used to prevent money laundering.
- The legislative framework existing in relation to the subject of money laundering and financing of terrorism has been developed by some of the most important international organisations, and it is also supported by the laws existing in countries that have transposed the main prevention measures established by such organisations into their own domestic legislation.



- The aim of the international laws and regulations on prevention of money laundering is to prevent and impede use of the financial system, as well as other areas of economic activity, for purposes of concealing the source of funds derived from any type of illegal participation in commission of a crime.

### Scope:

This Policy applies to all Accelya employees, whether full time, part-time or temporary. It is also expected that all contractors will act in a manner consistent with this Policy, a copy of which will be made available as part of their engagement. Accelya also aims to work with business partners who share our commitment to doing business the right way.



## 2. Governance and allocation of responsibilities

### Governance:



### ESG Oversight Committee

The ESG Oversight Committee is comprised of the General Counsel and Chief Human Resources Officer. The committee provides guidance and advice to the Senior Leadership Team on Environmental, Social and Governance matters. The committee meets with the wider ESG team on the quarterly basis. This ensures that performance and progress is managed effectively, and urgent matters can be communicated directly to the Senior Leadership Team.

### The ESG Team

The ESG team comprises the VP Strategist, Environment, Sustainability and Governance (ESG), the Global Head of Ethics, Compliance and Health & Safety and the VP of Diversity, Equity, and Inclusion.

### Responsibilities:

The Global Head of Ethics, Compliance and Health & Safety is responsible for the implementation and continuing management of this policy.



### 3. Risks

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The industry in which Accelya operates touches on activities that are exposed to the commission of criminal or unlawful acts susceptible to being considered as money laundering or financing of terrorism. The list below contains the types of transactions that are particularly susceptible to being linked to money laundering:

- Operations involving private investment, and financing obtained from sources other than regulated financial institutions.
- Transactions involving the sale of public or private shares in Accelya Group companies.
- Transactions involving funds with an unknown source or origin.
- Transactions carried out with entities or individuals based in countries considered to be tax havens or low-tax countries, as well as in those taking place in high-risk jurisdictions.
- Transactions carried out with public officials or authorities, or with persons having links to them.
- Transactions involving intermediaries, whether these may be individuals, entities, or organisations.
- Use of bearer negotiable instruments or any other type of physical or electronic means of payment.

Certain countries identified by the US, UK and EU are generally regarded as particularly exposed to risks of money laundering or financing of terrorism, whether as a result of (i) a lack of effective systems of prevention, (ii) high levels of corruption, (iii) significant off-shore financial activity, or (iv) low levels of taxation (tax havens). In addition, certain countries are subject to national and international Trade Sanctions, as set out in Accelya's Sanctions Policy. Any



questions on whether a country falls into the category of high risk should be directed to Finance who track the countries on the US, UK and EU lists.

In addition to high-risk countries, the applicable regulations also include individuals and entities known to have links to terrorist groups or organisations. In circumstances where there is any indication, that an individual or entity that has some sort of relationship with Accelya is linked to a terrorist group or organisation, it is imperative that Finance is notified prior to any form of engagement, so that appropriate checks are carried out by Finance.

Staff are responsible for exercising extreme caution when dealing with any business opportunities in high-risk countries and are required to consult Finance before engaging in any business discussions.

Regulations on money laundering and the financing of terrorism are complex and subject to change at short notice. If in doubt as to whether a particular transaction may be covered by regulation, this should be referred to Finance immediately, and no action taken pending further investigation.



## 4. Reporting

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Employees, suppliers and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Any breach of this policy and/or violation of applicable laws may result in liability and damage to Accelya's reputation, and will be subject to appropriate disciplinary measures, including formal warnings, suspension or termination of employment.

If you are an Accelya employee you must report any incidence or suspicion of money laundering in any part of our business or supply chain to the General Counsel and the Global Head of Ethics, Compliance and Health & Safety. If you are a supplier or third-party provider to Accelya you should inform your primary business contact with us.

Alternatively, employees and all suppliers or partners can report any concerns using the third party, independent whistleblowing process, it can be accessed [here](#)

We encourage openness and will support anyone who raises genuine concerns with the company whistleblowing policy, even if they turn out to be mistaken.

Reports are treated in accordance with our whistleblowing policy, acknowledged and acted upon as appropriate.



## 5. Review

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This policy will be reviewed annually by the ESG team and updated to ensure compliance with both legal requirements and best practice.