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DONCASTERS

GLOBAL MONEY LAUNDERING POLICY

POLICY NAME
Global Money Laundering Policy
PURPOSE
This Policy aims to maintain the high standards of conduct which currently exist within Doncasters by preventing criminal activity through money laundering.
OBJECTIVES
The objective of this Policy is to define Doncasters commitment to: <ul style="list-style-type: none"> • conducting all of its business in an honest and ethical manner; • acting professionally, fairly and with integrity in all its operations, business dealings and relationships worldwide; and • implementing and enforcing effective systems to demonstrate its zero-tolerance and the importance it attaches to preventing money laundering.
This Policy is a global minimum standard.
Where local legislations define higher standards, Doncasters entities will comply with them.
As set forth in our Code of Conduct, Doncasters complies with local laws in every country where it operates.
AUDIENCE
The policy applies to all companies within the Doncasters Group, including all operating companies under the operational control of Alloy Topco Limited.
In the following document a Doncasters Group entity is referred to as “Doncasters” or “the Company” interchangeably.
Doncasters is committed to ensuring that its stakeholders, including but not limited to its suppliers, consultants, and advisors, uphold the principles set out in this policy and adopt similar policies within their operations.
INCLUDED IN THIS POLICY IS....
<ol style="list-style-type: none"> 1. Money Laundering Activities 2. Identification Procedures 3. Breach of this Policy 4. Ongoing Monitoring 5. Reporting Mechanism & Complaint Procedure 6. Confidentiality & Protection Against Retaliation

CONFIDENTIALITY STATUS
Public
LOCAL ADAPTATION AUTHORISATION
Language Only.
DOCUMENT OWNER
Legal, Compliance & Risk
DOCUMENT REVIEWER
Executive
DOCUMENT APPROVER
Board of Directors
INTRODUCTION
<p><i>“To protect Doncasters’ reputation and avoid criminal liability, it is important that Doncasters does not become associated, however innocently, with the criminal activities of others”</i></p> <p style="text-align: right;"><i>Mike Quinn, CEO</i></p>
<p>Doncasters complies with all applicable multi-jurisdictional laws and regulations related to the prevention of money laundering and all relevant local anti-money laundering regulations in the countries where it operates.</p> <p>This Anti-Money Laundering Policy (the “Policy”), sets out the responsibilities of Doncasters, as well as those of its employees, officers and business partners, in observing and upholding its position against money laundering. It also provides information and guidance on how to recognise and deal with cases of money laundering.</p> <p>There are two main types of money laundering offences that may be committed:</p> <ul style="list-style-type: none"> • money laundering offences • failure to report money laundering offences <p>Money laundering offences:</p> <ul style="list-style-type: none"> • acquiring, using or possessing criminal property, • handling the proceeds of crimes, such as theft, fraud and tax evasion, • being knowingly involved in any way with criminal or terrorist property, • entering into arrangements to facilitate laundering criminal or terrorist property,

- investing the proceeds of crime in other financial products,
- concealing, disguising, converting or transferring criminal property,
- entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person,
- investing the proceeds of crimes through the acquisition of property/assets,
- transferring criminal property.

There are associated offences regarding due diligence and disclosures.

MONEY LAUNDERING ACTIVITIES

Money laundering is generally used to describe the activities of organised criminals converting the proceeds of crime into legitimate activities, thus hiding their true sources. Money laundering schemes come with varying levels of sophistication from the fairly simple to the highly complex. Straightforward schemes can involve cash transfers or large cash payments, whilst the more complex schemes are likely to involve the movements of money across international borders and through multiple bank accounts. Money laundering schemes typically involve 3 distinct stages

It is not possible to provide an exhaustive list of the ways to spot money laundering or state every scenario in which employees should be suspicious. However, the following are possible indicators of suspicion for money laundering activity:

- transactions which have no apparent purpose and which make no obvious economic sense;
- where the transaction being requested by the client/business partner, without reasonable explanation is out of the ordinary range of services normally requested or is outside the experience of Doncasters in relation to the particular client/business partner;
- where the client/business partner refuses to provide the information requested without reasonable explanation;
- unusual investment transactions without an apparently discernable profitable motive;
- a client/business partner refuses to proceed with the transaction when asked for identification;
- the extensive use of offshore accounts, companies or structures in circumstances where the client's/business partner's needs do not support such economic requirement;
- where, without reasonable explanation, the size or pattern of transactions is out of line with any pattern that has previously emerged;
- where cash payment has been offered by the client/business partner;
- where the client/business partner has no physical presence in the relevant country, or where business is to be transacted in a country with a poor reputation record;
- business activities that contradict core brand values;
- suspiciously close ties to government officials, previous allegations of corruption or unethical behaviour or lack of proportionality between the proposed work and fees;

This list is not exhaustive, and employees should apply common sense in determining whether there may be other reasons for Doncasters not to use a potential partner or enter into any contract with them.

IDENTIFICATION PROCEDURES

Doncasters has implemented the following procedures to prevent money laundering:

- Doncasters only appoints intermediaries (including sales agents and introducers) and engages only those business partners who demonstrate business integrity and who practice ethical conduct which meets the standards expected by Doncasters and all applicable laws and regulations.
- the appointment of intermediaries and the engagement of business partners is subject to them accepting the principles behind Doncasters' Code of Conduct, agreeing to abide by its Anti-Bribery and Anti-Corruption Policy, completion of a KYS form and a satisfactory compliance search (at the moment carried out by the legal team using World check software as well as approval of other checks such as Dunn & Bradstreet credit scores.

Decisions not to engage a particular business partner or intermediary or to cease to do business with them for reasons related to Doncasters' ethical governance policies should be taken by the Board but may be delegated to the Executive.

BREACH OF THIS POLICY

The breach of applicable laws may result in individuals or Doncasters receiving civil and/or criminal fines and/or punishment. If convicted, individuals may be subject to imprisonment and Doncasters may be barred from bidding for contracts with government and other public organisations in certain jurisdictions.

Doncasters considers a breach of this Policy as a serious offence. Any breach will result in disciplinary action, up to and including dismissal in appropriate circumstances. Business relationships with third parties who breach this Policy may also be terminated.

ONGOING MONITORING

Employees should review client/business partner at regular intervals to ensure that information held on each customer is not only accurate and up to date but is consistent with the knowledge of the client/business partner and its business.

In relation to third parties, including customers, suppliers and other third parties, Doncasters carries out customer due diligence – including sanction and politically exposed person screening – to ensure that its customers are who they say they are. Where necessary, Doncasters will carry out enhanced due diligence involving a higher level of identification and verification of the customer's identity) where a customer or a transaction involving the customer appears to be "high risk".

The information is recorded internally and kept up to date so that Doncasters can reassess its business risk if a customer's circumstances change. Further due diligence may be required if new people become involved at a customer.

Any suspicious activity must be reported in accordance with the Reporting Mechanisms & Complaint Procedure.

REPORTING MECHANISMS & COMPLAINT PROCEDURE

Reporting to Management

Management is responsible for the implementation of this Policy and for ensuring that all employees adhere to its aims and objectives.

Any employee or Doncasters representative who is concerned about, or is suspicious of any unlawful activity, is encouraged to contact the Legal Team or report it in accordance with the Speak Up Policy.

Reports made will be investigated by Legal, who may work with Internal Audit, in the first instance and later referred to the appropriate persons with Doncasters or externally as appropriate.

Legal, in consultation with the Head of Internal Audit will consider whether external reporting is required in the relevant jurisdiction.

Report through Speak Up

Employees can also report breaches of this Policy via the Speak Up service.

The Speak Up service is run by a company called Navex and is an external, independent reporting service designed for employees and others to report anonymously any violation of Law, our Code of Conduct, Corporate Values and related policies or directives, including this one, while complying with local regulations.

Details of the contact details can be found in our Code of Conduct, on posters around each site, on the Employee App and on SharePoint.

REPORT ONLINE

www.doncasters.ethicspoint.com

REPORT BY PHONE

From the UK:

Call: 0800 890 011

(when prompted, dial: 833 537 0829)

From the USA:

Call: 833-537-0829

From Germany:

Call: 0800 225 5288

(when prompted, dial: 833 537 0829)

From India:

Call: 000 800 050 3406

From Mexico:

For outside calls, dial your local access code followed by 800-288-2872.

Por Cobrar Spanish: 800-112-2020

(when prompted, dial: 833 537 0829)

From China:

For an outside line, dial the direct access number for your location:

China (Southern): 10-811

China (Northern): 108-888

(when prompted, dial: 833 537 0829)

CONFIDENTIALITY & PROTECTION AGAINST RETALIATION

Doncasters strictly prohibits retaliation against anyone who, in good faith, reports violations of this Policy or participates in an investigation, even if the investigation does not ultimately prove the concerns. Dishonest, bad faith, or otherwise abusive reports (such as false personal attacks aimed at specific individuals) are prohibited and may result in disciplinary action.

