

## Know Your Customer & Anti-Money Laundering

FMO (the Netherlands Development Finance Company) is the Dutch development bank. Since 1970 we have been a driving force behind investments empowering entrepreneurs in emerging markets. It is our role and mandate to create local prosperity in some of the world's most challenging economies.

FMO is committed to participating in international efforts to fight against money laundering and terrorist financing.

In order to comply with international anti-money laundering and terrorist financing regulations and national anti-money laundering and terrorist financing laws, FMO has developed and implemented a written 'Know Your Customer' policy, manual, working instructions and controls.

The FMO Know your Customer program includes (not limited to):

- Identification of potential money laundering and terrorist financing risks (for example Systematic Integrity Risk Assessment, "SIRA" and Risk Appetite Statement on integrity and tax integrity, "RAS")
- Identification of potential reputation risks (for example extensive adverse media screening)
- Screening against international sanctions lists (a.o. EU, UK, UN and OFAC sanction lists)
- Customer identification and verification (including their relevant representatives)
- Identification and verification of Ultimate Beneficial Owners of a customer
- The identification and assessment of Politically Exposed Persons (PEPs)
- Enhanced customer due diligence in case of a higher Know Your Customer risk
- Comprehensive Know Your Customer Risk assessment of each customer
- Data retention of customer records (Event driven reviews)
- Customer transaction monitoring and periodic KYC reviews
- Management of integrity and money laundering incidents
- Mandatory periodic Know your Customer and anti-money laundering awareness and training for all relevant staff