



Anti-Money Laundering

To protect DelAgua Group's ("The Company") reputation and avoid criminal liability, it is important not to become associated however innocently with the criminal activities of others. In particular, The Company and its Directors, employees, contractors and officers ("Staff") must ensure DelAgua Group does not receive the proceeds of criminal activities, as this can amount to the criminal offence of money laundering. This Code Policy sets out essential steps employees must take to avoid being implicated in money laundering.

Musts

Staff must immediately notify their Country Manager or Company Director if they have any suspicions about actual or potential money laundering activity. Staff must look out for warning signs of money laundering, such as:

Supplier requests to:

- Pay funds to a bank account in the name of a different third party or outside the country of their operation;
- Make payments in a form outside the normal terms of business;
- Split payments to several bank accounts;
- Overpay.

Customer payments to The Company:

- From multiple bank accounts;
- From bank accounts overseas when not a foreign customer;
- Made in cash when normally made by cheque or electronically;
- Received from other third parties;
- Made in advance when not part of normal terms of business.

Any Staff involved in engaging or contracting with third parties such as new suppliers, customers and distributors **must**:

- Ensure that the third parties in question are subject to screening to assess their identity and legitimacy before contracts are signed or transactions occur. Various factors will determine the appropriate forms and levels of screening;
- Determine, with guidance from their Country Manager or Company Director, which tools and processes should be used to facilitate appropriate screening and record-keeping;
- Carefully consider, where necessary in consultation with their Country Manager or Company Director, screening outcomes before deciding whether to do business with the third party.
- Finance managers or auditors who support Supply Chain Management and Customer Development must regularly monitor and/or review suppliers, customers and other third-party service providers to identify business activity or governance that could indicate money laundering is taking place.



Must Nots

Staff must not simply assume relevant third-party screening has already taken place: failure to check or update screenings periodically may put The Company and its Staff at risk.