

CDC's Commitment to Anti-Money Laundering and Counter-Terrorism Financing

November 2018



CDC's Commitment to Anti-Money Laundering and Counter-Terrorism Financing

CDC is committed to preventing and taking measures to guard against being used as a medium for money laundering and terrorism financing activities and any other financial crime. In line with the UK's laws on financial crime and the Financial Conduct Authority's regulation, we have appropriate systems and controls in place to counter the risk of CDC funding being used to further financial crime or of any client or counterparty being associated with criminal activity.

Across all of its offices, CDC adopts a risk-based approach to assess and monitor financial crime risk in compliance with UK laws on money laundering and counter-terrorism financing, including the UK Money Laundering Regulations 2017, the Proceeds of Crime Act, and the Terrorism Act 2000 as well as international best practice. CDC regularly assesses the adequacy of its systems and controls to ensure that they appropriately mitigate the company's financial crime risks and reflect any legal and regulatory developments.

CDC takes appropriate steps before making any investment to determine:

- ✦ The identity of the customer(s) with whom it proposes to transact;
- ✦ The identity of the ultimate beneficial owner(s);
- ✦ The details of the ownership and control structure of the customer;
- ✦ The customer's track record, reputation and any prior allegations of wrongdoing;
- ✦ The purpose and intended nature of the business relationship;
- ✦ The involvement of any politically exposed persons.

CDC will not enter into a transaction if it is unable to obtain adequate Customer Due Diligence ("CDD") and Know Your Customer ("KYC") information.

CDC will also take all reasonable measures to mitigate risks including working with our fund managers and portfolio companies to help them understand the integrity challenges they face and help them strengthen prevention controls.

CDC has appointed a Money Laundering Reporting Officer (MLRO) to evaluate reports of suspicious activity from CDC staff. The MLRO considers all internal reports and makes an external report to the National Crime Agency, should the officer determine that there are reasonable grounds for reporting.


All CDC staff members receive training on anti-money laundering and counter-terrorism financing on an annual basis to enable them to recognise and report suspicious activity and help protect CDC from such risks.

CDC's commitment to identifying and preventing money laundering and terrorism financing continues throughout the investment cycle. We conduct ongoing monitoring throughout the lifetime of an investment to ensure that transactions are consistent with CDC's knowledge of the customer and its business.



CDC Group plc
123 Victoria Street
London SW1E 6DE
United Kingdom
+44 (0)20 7963 4700

cdcgroup.com

 [linkedin.com/company/cdc-group-plc](https://www.linkedin.com/company/cdc-group-plc)

 [@CDCgroup](https://twitter.com/CDCgroup)

CDC Group plc is regulated by the Financial Conduct Authority. Registered address as above.
Registered in England No. 3877777