



# Anti-Money Laundering Policy

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<b>Sign off</b>	
<b>Valid from</b>	1.1.2017
<b>Updated</b>	25.1.2022
	30.4.2021
<b>Validity</b>	Unlimited unless otherwise updated or replaced

## Table of contents

1.	Policy Statement .....	2
2.	Effect of this policy.....	2
3.	Responsibility for this Policy .....	2
4.	Responsibilities of P3 Representatives .....	2
5.	Money laundering activities .....	3
6.	Prohibitions and Requirements .....	4
7.	Identification Procedures.....	4
8.	Raising a Concern.....	5
9.	Violations of this Policy.....	5
10.	Monitoring and Review.....	5
11.	Training and Communication.....	6
	Schedule 1 .....	7

## **1. Policy Statement**

- 1.1 It is the policy of P3 Logistic Parks group ("**P3**") to conduct all of its business in an honest and ethical manner. P3 is committed to acting professionally, fairly and with integrity in all its operations, business dealings and relationships worldwide and to implementing and enforcing effective systems to demonstrate its zero-tolerance and the importance it attaches to preventing money laundering.
- 1.2 P3 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 i where it operates.
- 1.3 This Anti-Money Laundering Policy (the "**Policy**") sets out the responsibilities of P3, 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 recognize and deal with cases of money laundering.
- 1.4 Capitalized terms used in this Policy are either defined directly or in Schedule 1 to this Policy.

## **2. Effect of this policy**

- 2.1 This Policy applies to all individuals working at all levels and grades within P3 notwithstanding the legal basis of their engagement with P3 ("**P3 Persons**").
- 2.2 This Policy also applies, to the extent reasonable and feasible, to P3 business partners and their subsidiaries and branches worldwide, as well as any other person or entity associated with P3, wherever they are located ("**Contractors**"; Contractors and P3 Persons also collectively referred to as "**P3 Representatives**").

## **3. Responsibility for this Policy**

- 3.1 The P3 Management Team has overall responsibility for ensuring that this Policy complies with P3's legal and ethical obligations, and that everyone under P3's control complies with it; administrative responsibility is delegated to Group General Counsel and the P3 Compliance Officer.
- 3.2 The Group General Counsel has responsibility for advising P3 Persons on anti-money laundering issues.
- 3.3 P3 Compliance Officer has primary and day-to-day responsibility for implementing this Policy, for monitoring its use and effectiveness, and for dealing with any queries regarding its interpretation.
- 3.4 P3 managers at all levels are responsible for ensuring that the individuals reporting to them are made aware of and understand this Policy and are given adequate and regular training as organized and provided by the P3 Compliance Officer.

## **4. Responsibilities of P3 Representatives**

- 4.1 P3 Representatives – meaning P3 Persons and Contractors - are obliged to read, understand and comply with this Policy.

- 4.2 The prevention, detection and reporting of money laundering is the responsibility of all P3 Representatives. P3 Representatives are required to avoid any activity that might lead to or imply a breach of this Policy.
- 4.3 P3 Persons are obliged to report any transaction, no matter how seemingly insignificant, that might give rise to a violation of this Policy and/or any applicable Anti-Money Laundering Laws immediately to the Group General Counsel and/or P3 Compliance Officer.
- 4.4 P3 Contractors are expected to report promptly in a confidential manner to any P3 Person, if they suspect that a violation of the law or this Policy has occurred or is about to occur or if they become aware of suspicious, risky or money-laundering conduct and the P3 Person is then obliged to report the same to the Group General Counsel and/or P3 Compliance Officer.
- 4.5 P3 strives to encourage openness and supports anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.
- 4.6 P3 is committed to ensuring that no one suffers any detrimental treatment as a result of their good faith reporting of their suspicion under this Policy. If anyone believes they have suffered such treatment, they should inform the Group General Counsel and/or P3 Compliance Officer immediately.
- 4.7 Any P3 Person who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct. P3 reserves the right to terminate its contractual relationship with any P3 Person or Contractor who breaches this Policy.
- 4.8 P3 Representatives are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the P3 Compliance Officer.

## **5. Money laundering activities**

- 5.1 Money laundering is generally used to describe the **activities of organized criminals converting the proceeds of crime into legitimate activities, thus hiding their true sources.**
- 5.2 It is not possible to provide an exhaustive list of the ways to spot money laundering or state every scenario in which P3 Representatives should be suspicious.

However, the following are examples of possible “indicators of suspicion” for money laundering activity:

- (a) transactions which have no apparent purpose and which make no obvious economic sense;
- (b) 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 P3 in relation to the particular client/business partner;
- (c) where the client/business partner refuses to provide the information requested without reasonable explanation;
- (d) unusual investment transactions without an apparently discernible profitable motive;

- (e) A client/business partner refuses to proceed with a transaction when asked for identification;
- (f) the extensive use of offshore accounts, companies or structures in circumstances where the client's/business partner's needs do not support such economic requirements;
- (g) where, without reasonable explanation, the size or pattern of transactions is out of line with any pattern that has previously emerged;
- (h) where cash payment been offered by the business partners/clients;
- (i) 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;
- (j) business activities that contradict core brand values;
- (k) suspiciously close ties to government officials, previous allegations of corruption or unethical behavior or a lack of proportionality between the proposed work and fees;
- (l) engage in any activity that might lead to a breach of this Policy.

The list above is not exhaustive and P3 Representatives should apply common sense in determining whether there may be other reasons for P3 not to use a potential partner or enter into any contract with them.

- 5.3 P3 Representatives are expected to comply with this Policy and, if deemed appropriate in the circumstances, to enter into a written agreement with P3 that includes standard anti-money laundering provisions.

## 6. Prohibitions and Requirements

**P3 Persons shall not engage in money laundering. P3 Persons are obliged, and Contractors are expected to comply with all aspects of this Policy**, including the specific prohibitions and guidelines set out here as well as all applicable anti-money laundering laws.

## 7. Identification Procedures

- 7.1 P3 has implemented the following framework procedures to prevent money laundering:

- (a) P3 appoints only these intermediaries (including sales agents, introducers and other lobbying-type consultants) and engages only those business partners who demonstrate business integrity at all times and who practice ethical conduct which meets the standards expected by P3 and all applicable laws and regulations.
- (b) The appointment of intermediaries and the engagement of business partners is subject to P3's [Anti-Bribery & Corruption Policy](#) and [P3's KYC Policy](#).

- 7.2 Decisions not to engage a particular business partner or intermediary or to cease to do business with them for reason related to P3's ethical governance policies should be taken by members of the P3 Management Team.

## 8. Raising a Concern

- 8.1 If a **P3 Representative** is concerned about or suspicious of any form of unlawful activity, they are encouraged to **contact the Group General Counsel and/or Compliance Officer or report it in accordance with P3's Whistleblowing Policy**.
- 8.2 Reports made are investigated by the Group General Counsel, in consultation with the Head of Internal Audit, in the first instance, and later referred to the appropriate persons within P3 or externally as appropriate.
- 8.3 The Group General Counsel, in consultation with the Head of Internal Audit, shall consider whether external reporting is required in the relevant jurisdiction and, where necessary, notify to the governmental money laundering reporting officer.

## 9. Violations of this Policy

- 9.1 **The violation of applicable laws may result in individuals or P3 receiving civil and/or criminal fines and/or punishment.** If convicted, individuals may be subject to imprisonment and P3 may be barred from bidding for contracts with government and other public organisations in certain jurisdictions.
- 9.2 **P3 considers a breach of this Policy as a serious offence.** Any violation will result in disciplinary action, up to and including dismissal in appropriate circumstances. Business relationships with Contractors who violate this Policy may also be terminated.
- 9.3 P3 Persons shall ensure that they are familiar with the content of this Policy and shall adhere to it at all times.

## 10. Monitoring and Review

### 10.1 Confidentiality

Internal reports made by P3 Representatives are kept confidential and are disclosed only in accordance with this Policy and applicable law. Follow-up action is initially determined by the Group General Counsel and the Head of Internal Audit, acting together, on a case by case basis, using external advice, if necessary.

### 10.2 Group General Counsel

- (a) The Group General Counsel is directly accountable for the oversight of the anti-money laundering program and is the person to whom the P3 Compliance Officer reports.
- (b) The Group General Counsel is responsible for ensuring that appropriate systems and controls are put in place locally and that this Policy is effectively implemented.
- (c) It is the responsibility of the Group General Counsel to respond swiftly and effectively to any breach of this Policy that is brought to his/her attention, as well as shortcomings in this Policy identified by the P3 Compliance Officer when reporting to the Group General Counsel.
- (d) If any aspect of this Policy appears to be inadequate to ensure local compliance with relevant anti-money laundering law, it will be escalated immediately to the P3 Management Team with a view to highlighting the need for changes to or

enhancement of this Policy.

- (e) The Group General Counsel is responsible for ensuring the assessment of local compliance with this Policy and for agreeing with the P3 Compliance Officer on the compliance monitoring program and training and reporting requirements which should be implemented locally (subject to the minimum standards set by this Policy on a global basis).

10.3 Internal reporting and careful management of disclosed information enables P3 to gather feedback on the effectiveness of this Policy and its implementation and to ensure that its adequacy and effectiveness remain optimal.

## **11. Training and Communication**

11.1 New P3 Persons receive anti-money laundering training as part of their induction training.

11.2 All P3 Persons receive training at least on an annual basis. The extent and nature of the training relevant to a P3 Person is defined by his/her line of business or corporate group to reflect the risks facing the employee in that capacity, as well as the nature of their responsibilities. In high risk environments, P3 Persons receive appropriate training to deal with potential situations where risks of money laundering may arise. Completed training sessions are tracked by P3.

11.3 Awareness bulletins and comparable communications reminding P3 Persons of their anti-money laundering responsibilities will be communicated to P3 Persons at least on an annual basis.

11.4 P3's zero-tolerance approach to money laundering is communicated to all suppliers, contractors and business partners at the outset of P3's business relationship with them, and as appropriate thereafter.

11.5 Associated Persons (as defined in Schedule 1) who are appointed by P3 are expected to participate in appropriate training (which will at a minimum include reviewing this Policy) upon request and to enter into a written agreement with P3 that includes anti-money laundering provisions, unless the P3 Compliance Officer and Group General Counsel are satisfied, having undertaken appropriate due diligence, that the relevant person has its own appropriate procedures.

## Schedule 1

### Definitions

<b>“Associated Persons”</b>	means an individual or company that acts on behalf of P3 or otherwise performs any services for or on behalf of P3 in any capacity whatsoever. A typical example is a sales agent, intermediary or introducer, but it can also include advisers, consultants, joint venture partners and contractors whose mandate involves actively representing and/or standing “in the shoes of” P3.
<b>“Group General Counsel”</b>	means the person mentioned on P3 web page as such and/or communicated to P3 Persons internally.
<b>“P3”</b>	means P3 Group S.à r.l. and each of its subsidiaries and subsidiary undertakings (for the avoidance of doubt in any jurisdiction).
<b>“P3 Compliance Officer”</b>	means the person responsible for compliance matters communicated to P3 Persons internally
<b>“P3 Management Team”</b>	means Management Team of P3, as constituted from time to time.
<b>“P3 Persons”</b>	all individuals working at all levels and grades within P3 notwithstanding legal ground of their engagement with P3.