

Anti-Money Laundering, Trade Controls and Economic Sanctions

Part 1/2

We do not do business with criminal organisations or with any person or company subject to economic sanctions. We conduct business in compliance with all relevant trade controls, including rules related to boycotts. **Trade restrictions or export controls** apply to the shipment or transmission of goods (including raw materials and packing, finished products, equipment, promotional and marketing items), services, technology and money across international borders. **Anti-boycott** laws prohibit companies from participating in, or cooperating with, an international boycott that is not approved or sanctioned. **Sanctions** come in many forms including: **Financial Sanctions** which prohibit contracting with or paying or receiving money from a person or company listed on a country's sanctions list, and **Trade Sanctions** which restrict the movement of goods to or from sanctioned countries.

Why is it important?

Violating money laundering, trade controls or sanctions laws can result in serious legal consequences, including imprisonment, fines and bans on the sales of our products. As a global company, shipping and sourcing products around the world, we must be aware of the limitations imposed by these laws.



What must I do?

- Conduct due diligence on third parties before onboarding to (1) learn about their reputations, business experience, origin of goods, and beneficial owners and directors and (2) ensure TMICC is not working with any criminal entities who are trying to use legitimate business with us to clean their money from criminal activities.
- **Ensure** third-party screening is conducted and any issues are remediated in full before contracts are signed and transactions occur; do not assume this has been done – always confirm with Procurement, Supply Chain, Customer Development, and / or Legal.
- Do not transact with any party who is subject to economic sanctions. Follow TMICC processes for onboarding, including verifying third parties are not on sanctions lists before awarding any business, keeping accurate and complete records of transactions, and knowing the background of the third parties with which we are working.
- Notify my Business Unit and Country General Counsel immediately if I suspect a business partner is engaged in any illegal activity, products may be sourced from sanctioned countries or sanctioned third parties or prohibited boycott requests. Typical red flags include unusual or overly complex payment structures, sudden changes in ownership of the third party, inconsistent or incomplete documentation of expenses and experience, resistance to providing required information, or incomplete information about the origin of goods.



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Part 2/2

What must I do?

- Obtain prior clearance from my Business Unit and Country General Counsel, plus a senior Finance Manager, before proceeding with any transaction outside normal business terms, such as payments to accounts that do not match the name, country, or currency of the country of the business partner; those made in cash or overpaid; and those split across several bank accounts or purchase orders.
- Do not inform any third party suspected of money laundering that they are under investigation.
- Seek guidance from my Business Integrity Officer when screening outcomes are unclear or where extra scrutiny is needed.
- Disclose to Business Integrity if I need to recuse myself from an Economic Sanctions perspective, for example, if I am a US citizen and prohibited from engaging in a certain transaction.



Where do I go for more information?

Business Integrity Officer, Global Policy Portal or [Disclosure Tool](#).

