

## JANUS SERVICES B.V.

Den Haag, February 2023

## **JANUS Group**

## Compliance and KYC Statement Janus Services in respect of preventing Money Laundering and countering Terrorist Financing

This notice from Janus Services B.V and its affiliates (hereinafter also referred to as "company" or "JANUS Group") is to inform you about the anti-money laundering policy that the JANUS Group adheres to.

The JANUS Group was founded in 1996 and is a Dutch based general trading company active in the fast-moving consumer goods ("FMCG") sector. Since the beginning the company has been active in the Central and West African regions ("Africa"). The Group food brands are renowned in Africa for their impeccable quality. The Company is a reputable and reliable partner for our customers which whom JANUS Group have long standing relationships.

The Group recognizes that the African FMCG sector in which JANUS Group operate is considered classified high risk.

The JANUS Group maintains high standards of integrity in the conduct of its business and in compliance with applicable laws and regulations. The Group implemented a risk-based Know-Your-Customer ("KYC") procedure monitored by the compliance department. This department is, amongst others, responsible for documenting all the relevant information on both customers and suppliers. The company will ensure that as far as possible and relative to its resources, the manner in which it chooses its clients, other counterparties identifies suppliers and counterparts conducting themselves in a law-abiding manner. This conduct commitment by the company and expectation from third parties includes identifying and countering money laundering and terrorism financing risks and notifying the appropriate authorities when those risks become apparent.

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In the area of compliance priorities, the Group flags third-party payments as high-risk. Group policy is that all payments require to be remitted out of the bank account held in the name of the company that JANUS Group do business with. The Group's accounting department is actively monitoring potential third-party payments. Subsequently, the accounting department urgently performs due diligence on the third-party payment. The compliance department will request the customers to sign a third-party declaration to support the decision to move forward with a third-party payment arrangement. In all cases that the Group receives money via unaccepted third parties, it will transfer the money back to the original account from which the funds where remitted.

The same accounts for supplier requests to pay funds to a bank account in the name of a different third party or outside the country of their operation. Also, in such cases the accounting department will assess whether a transaction is acceptable or not. This is all part of the due diligence inquiry.

The JANUS Group in no way condones the illicit transfer of funds, any activity designed to launder funds, or any attempts or actions designed to provide funding to proscribed groups or those thought to be engaged in organized crime/terrorism.

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