



## Anti-Money Laundering Policy

Unlifeglobal Limited (the 'Company') is committed to the highest standards of Anti-Money Laundering (AML) and Anti-Financial Crime (AFC) including Anti-Bribery and Corruption (ABC), Counter Terrorism Financing (CTF), Anti-Fraud and other punishable criminal acts. The members of the Management Board and all employees are required to adhere to these standards to protect the Company and its reputation from being misused for money laundering and/or terrorist financing or other illegal purposes.

The Company will take measures to prevent exposure to money laundering, to identify areas in which money laundering may occur and will adhere to all applicable laws and regulations in all countries where it conducts business, or with whom it has business relationships.

The Company will examine its anti-money laundering strategies, goals and objectives on an ongoing basis. Adherence to the Company's anti-money laundering Policy is the responsibility of all management and employees.

### 1. Terms and Definitions

#### The Company

means Unlifeglobal Limited.

#### Customer Due Diligence ('CDD')

means identifying the customer and verifying the customer's identity on the basis of documents, data or information obtained from a reliable and independent source; or where there is a beneficial owner who is not the customer, taking adequate measures, on a risk-sensitive basis, to verify the identity of the beneficial owner, including, in the case of a legal person, trust or similar legal arrangement, measures to understand the ownership and control structure of the person, trust or arrangement; and obtaining information on the purpose and intended nature of the business relationship.

#### Enhanced Due Diligence ('EDD')

enhanced customer due diligence measures and enhanced ongoing monitoring that must be applied where the customer has not been physically present for identification purposes or where a relevant person proposes to have a business relationship or carry out an occasional transaction with a politically exposed person.

#### JMLSG Guidance Notes

Joint Money Laundering Steering Group 'Prevention of Money Laundering/Combating the Financing of Terrorism' guidance notes.

#### Local Regulations

laws and regulations applicable in the relevant Country.

#### Money Laundering

means an act that falls within section 340 (11) of the Proceeds of Crime Act 2002.

#### Politically Exposed Person ('PEP')

means a person that falls within the definition contained within the Money Laundering Regulations 2007 Schedule 2, section 4. A PEP is an individual who is or has been entrusted with a prominent public function in a state other than the U.K., an EU Institution or an international body; their immediate family members, spouse, partner and close associates; who may be potentially abused for the purpose of committing money laundering (ML) offences and related predicate offences, including corruption and bribery, as well as conducting activity related to terrorist financing (TF).

#### Regulator

means the Financial Conduct Authority ('FCA') or a Home State Regulator or authority in a country or Territory outside the U.K.

#### Regulations

means all statutes, statutory instruments, orders, regulations, guidance and codes of practice (whether or not having the force of law) in force from time to time which may apply to the parties in the conduct of their business including without limitation the requirements, rules, regulations, guidance and codes of practice of the Financial Services and Markets Act 2000, any Regulator, the Money Laundering Regulations 2007, the Terrorism Order and the JMLSG Guidance Notes.

#### Restricted Person

shall have the meaning given to it in the Terrorism Order.

#### Terrorism Order

means the Terrorism (United Nations Measures) Order 2009 No. 1774 and any orders, regulations, codes of practice, instruments or other subordinate legislation (as defined in section 21 (1) of the Interpretation Act 1978) which amends, extends, consolidates or replaces the same (whether or not having retrospective effect).

## 2. Introduction

2. The Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering Regulations 2007 place obligations on the Company and its employees with respect to suspected money laundering, the key points being:
  - 2.1.1 The reporting and detection of suspected money laundering.
  - 2.1.2 Any member of management or employee who suspects money laundering activity must report this promptly to the Company's Money Laundering Reporting Officer ('MLRO') (see attached reporting form in order to record any suspicions of activity/suspicious activity).
  - 2.1.3 The Money Laundering Regulations are complex and detailed. In the case of any doubt arising with regard to the requirements of this legislation, please refer to the document available on [www.legislation.gov.uk/ukxi/2007/2157/contents/made](http://www.legislation.gov.uk/ukxi/2007/2157/contents/made) or please request further information from the MLRO.

## 3. Objectives of this Policy

- 3.1 The standards set out in this Policy are minimum requirements based on applicable legal and regulatory requirements and apply to the Company, its management and employees. These requirements are intended to prevent the Company, its management, employees and clients from being misused for money laundering, terrorist financing or other financial crime. This Policy establishes the general framework for the fight against money laundering and the financing of terrorism.

## 4. Application

- 4.1 The Policy applies to all management and employees, and sets out procedures for the reporting of suspected money laundering activities with the aim of reducing potential criminal activity. The Policy defines procedures that will assist the Company to comply with its legal obligations.
- 4.2 Wherever local regulations are stricter than the requirements set out in this Policy, the more stringent standard is the one that must be applied. If any applicable laws are in conflict with this Policy, the MLRO must be consulted in order to resolve the conflict.
- 4.3 If the minimum requirements set out in this Policy cannot be applied in a certain country because application would be against local law, or regulation, or cannot be enforced due to other than legal reasons, the Company has to assure that it will not:
  - 4.3.1 enter into a business relationship;
  - 4.3.2 continue a business relationship;
  - 4.3.3 carry out any transactions.

## 5. Minimum requirements of the Policy

- 5.1 Failure to comply with the procedures defined within this Policy may lead to disciplinary action in line with the Company's Disciplinary Procedures.

## 6. What is Money Laundering?

- 6.1 'Money laundering' is a term used which relates to offences involving the proceeds of crime or terrorism funds.
- 6.2 The following acts are defined as 'primary acts' of money laundering:
  - 6.2.1 Concealing, disguising, converting or transferring criminal property or removing such property from the UK (section 327 of the Proceeds of Crime Act (POCA) 2002).
  - 6.2.2 To enter into or become concerned in an arrangement which the relevant person knows or suspects will assist the acquisition, retention, use or control of criminal property or on behalf of another person (POCA section 328).
  - 6.2.3 Acquiring, using or possessing criminal property.

Money Laundering is the introduction of assets derived from illegal and criminal activities (predicate offences) into the legal, financial and business cycle. Offences are for example the forgery of money, extortionate robbery or drug crime as well as fraud, corruption, organised crime, or terrorism and so on. Predicate offences for money laundering are defined by local law.

### 6.3 Failure to disclose and 'tipping off'

6.3.1 There are two 'secondary' offences which relate to the failure to disclose any of the three primary acts detailed in section 6.2 and 'tipping off' (POCA section 330).

6.3.2 'Tipping off' is where someone informs a person or persons involved in, or suspected to be involved in money laundering acts, in such a way as to reduce the likelihood of their being investigated.

### 6.4 The three stages of money laundering

6.4.1 'Placement' is the introduction of illegally obtained monies or other valuables into financial or nonfinancial institutions.

6.4.2 'Layering' is the separating of the proceeds of criminal activity from their source through the use of layers of complex financial transactions. These layers are designed to hamper the audit trail, disguise the origin of funds and provide anonymity.

6.4.3 'Integration' is the placing of the laundered proceeds back into the economy in such a way that they re-enter the financial system as apparently legitimate funds.

These "stages" are not static and overlap broadly. Financial institutions may be misused at any point in the money laundering process.

6.5 It is important that all management and employees are aware of their responsibility to report any suspicions of money laundering activity as detailed within this Policy (see section 8, 'Reporting'). All management and employees have a responsibility to act promptly and to report any suspicions to the MLRO in order to prevent any breach of legislation which could result in serious criminal penalties.

## 7. The Money Laundering Reporting Officer ('MLRO')

7.1 The person nominated to receive disclosures about money laundering activity is the MLRO. The MLRO will deal with all disclosures confidentially and make decisions on reporting the activity to the Serious and Organised Crime Agency (SOCA) in the appropriate manner. All reports will be retained for five years.

**The MLRO for Unilife Global Limited is Stephen Conway: [stephen.conway@unihealthandlife.com](mailto:stephen.conway@unihealthandlife.com)**

## 8. Reporting

8.1 Any person who suspects money laundering activity (the 'suspicious activity') should report their suspicions promptly to the MLRO using the form attached (see the reporting form for completion by the Money Laundering Reporting Officer, which appears on page 6 of this document and is referenced AML Form 1 - 'The Disclosure Report'). Upon receipt of the report, the Money Laundering Reporting Officer may contact the reporting person directly to discuss the content of the report as required.

8.2 No further enquiries should be made about the suspicious activity after reporting to the MLRO for action. It is essential that no subsequent progress should be made in any transaction relating to the suspicious activity, without first obtaining authorisation from the MLRO.

8.3 No disclosure should be made to any other person, whether inside or outside the Company, that would indicate suspicions of money laundering. Any person reporting a suspicious activity should not discuss the matter with others or note on file that a report has been made to the MLRO as this may result in the suspect becoming aware of the situation ('tipping off').

8.4 The MLRO will promptly evaluate any Disclosure Report to determine whether it should be reported to the SOCA.

8.5 The Money Laundering Reporting Officer will, if necessary, promptly report the matter to the SOCA. Any report made should be executed in the prescribed manner using the standard electronic report form available via [www.soca.gov.uk](http://www.soca.gov.uk).

8.6 Failure to report a disclosure to SOCA without reasonable grounds is considered a criminal offence. All disclosures will be retained on file for five years.

## 9. Customer Due Diligence (CDD)

9.1 The Company is required to carry out the following measures:

9.1.1 To identify the customer and verify the customer's identity on the basis of documents, data or information obtained from a reliable and independent source.

9.1.2 Where there is a beneficial owner who is not the customer, to identify the beneficial owner and take adequate measures, on a risk sensitive basis, to verify the identity so that the relevant person is satisfied that he knows who the beneficial owner is. This includes, in the case of a legal person, trust or similar legal arrangement, measures to understand the ownership and control structure of the person, trust or arrangement.

9.1.3 To obtain information on the purpose and intended nature of the business relationship.

9.2 Identification documentation must be retained for five years after the end of the business relationship.

## 10. Enhanced Due Diligence ('EDD')

10.1 The extent of enhanced due diligence measures that the Company undertakes is determined on a risk-sensitive basis.

10.2 The Company is required to demonstrate that the extent of the enhanced due diligence measures it applies is commensurate with the money-laundering and terrorist financing risks it faces or it has identified.

10.3 In all cases, the MLRO must be consulted where it is determined that EDD is required.

10.4 Where the customer has not been physically present for identification purposes, specific and adequate measures must be taken to compensate for the higher risk, for example, by applying one or more of the following measures:

10.5.1 have approval from senior management for establishing the business relationship with that person;

10.5.2 take adequate measures to establish the source of wealth and source of funds which are involved in the proposed business relationship or occasional transaction; and

10.5.3 where the business relationship is entered into, conduct enhanced ongoing monitoring of the relationship.

## 11. Guidance and Training

11.1 The Company will make all management and employees aware of the requirements and obligations placed on the Company and on themselves as individuals by anti-money laundering legislation and where deemed appropriate and proportional, give targeted training to those most likely to encounter money laundering.



Part A

**Report to the Money Laundering Reporting Officer**

To **Money Laundering Reporting Officer**

From (insert name of employee)

Ext/Telephone number

Urgent?  Yes  No

Date by which response needed

**Details of Suspected Offence**

Names(s) and  
address(es) of person(s) involved:

[If a company/public body, please  
include details of nature of business.]

Nature, value and  
timing of activity involved:

[Please include full details e.g. explain  
what, when, where and how the activity  
occurred. Continue on a separate sheet  
if necessary.]







AML Form 1 CONFIDENTIAL  
Disclosure Report

Is consent required from SOCA for any ongoing or imminent transactions which would otherwise be 'prohibited acts'?

Yes

No

If 'Yes', please confirm full details

Date consent received from SOCA

Date consent given by you to employee

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to SOCA, please set out below the reason(s) for non-disclosure

Date consent given by you to employee for any 'prohibited act' transactions to proceed

Other relevant information

Signed

Date

**THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS**