

# **POLICY ON MONEY LAUNDERING**



**SEPTEMBER 2013**

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CDC is committed to deterring the use of its funds and services to aid money laundering or in the furtherance of financial crime. This policy re-states CDC's long standing approach to the risk of money laundering. It is the responsibility of every employee to take all actions necessary to protect CDC from such a risk.

Reasonable suspicions concerning the source of assets or the nature of a transaction may not be ignored. Our policy is to be alert to suspicious transactions and activity and to report it.

CDC will take appropriate steps before making an investment to confirm: (i) the identity of the Customer with whom it is dealing; (ii) the identity of the Ultimate Beneficial Owners of that Customer; and (iii) the use to which our investment will be put.

CDC promotes Know Your Customer ("KYC") practices as a cornerstone principle for CDC's business ethics and practices, fosters a controlled environment where no business with an external counterparty is transacted until all essential information concerning the counterparty has been obtained, and encourages regular self-assessments of compliance with the Policy by CDC, the funds in which it invests and portfolio companies. CDC and its employees will maintain compliance with UK and European anti-money laundering laws, regulations and applicable international best practices.