

Policy Applies to:

This AML Policy applies to all Superhumans Center employees, contractors, agents, and third-party service providers, regardless of their location or role. It also covers all Superhumans transactions, including but not limited to the receipt and disbursement of funds, billing, and payment processing.

Introduction:

Superhumans Center (hereafter "Superhumans") is committed to maintaining the highest standards of ethical behavior and regulatory compliance. To this end, the Hospital has implemented this Anti-Money Laundering Policy ("AML Policy") to prevent the use of the Superhumans services for money laundering or terrorist financing activities.

Superhumans must regularly review and update processes and procedures to protect itself and its stakeholders against money laundering attempts. This policy has been implemented to meet legislative requirements, assist with mitigating money laundering risk and update procedures to address suspected cases.

Definition and legal context:

Money Laundering is the process of taking illegitimate proceeds from criminal activity and transforming them through various stages into what appear to be legitimate assets. Money Laundering has three stages:

- Placement: Movement of criminal property/proceeds from their source (i.e. cash paid into a bank account).
- Layering: Transactions involved in concealing the origin (i.e. cash transferred to several other accounts overseas).
- Integration: Movement of laundered proceeds into the economy (i.e. a 'front' company issues what appears to be a legitimate invoice and invoice is paid with 'layered' cash).

Any individual found to be connected with money laundering activity, at any stage, could face imprisonment and fines.

There is no monetary limit on suspicious business activities that might give rise to money laundering concerns, which should be reviewed and risk assessed.

Responsibilities:

To comply with the AML regulations and to ensure the Superhumans has appropriate internal controls to mitigate the risk associated with money laundering activity, Superhumans must satisfy the following key requirements:

- Obtain, and retain for the duration of the relationship plus five years, evidence of the identity of our customers and details of the business relationship (KYC).
- Ensure disclosure processes are in place allowing reporting of suspicious or suspected activity to the Director.
- Ensure training is provided to assist all staff, particularly those with finance related roles, in understanding AML, including what processes are in place internally to facilitate disclosure and what they can do to help mitigate risk.

Employees:

Money Laundering regulations apply to all employees, not just those in finance facing roles. Should any member of staff become aware that money laundering activity has or is taking place, or concerned about their own involvement in a situation, they must disclose this at the earliest opportunity to the Director. Failure to do so could result in the employee committing an offence and becoming personally liable to prosecution. In addition, the employee could become subject to internal investigation. Employees should use the 'AML Disclosure Report' (Appendix A) to notify the Director and guidance in doing so is provided under Section "**Disclosure**"

Director:

The Director as a part of AML Policy must:

- Oversight of the Superhumans compliance with AML regulations
- Review of all disclosures including assessing the need to escalate to the relevant governing bodies.
- Retention of all disclosures, actions taken and annual reporting to audit committee.

Anti-Money Laundering Procedures:

1. Know Your Customer (KYC) Procedures.

Superhumans will verify the identity of all new clients before accepting any payments. Superhumans will conduct due diligence checks on all individuals and entities to ensure that they are legitimate and not associated with any money laundering or terrorist financing activities. Superhumans will also monitor the ongoing relationship with clients and update their information when necessary.

2. Suspicious Activity Monitoring and Reporting

Superhumans will monitor all transactions for suspicious activity, including but not limited to, transactions involving large amounts of cash, unusual payment patterns, and transactions involving high-risk countries. Superhumans will also report any suspicious activity to the appropriate authorities promptly.

3. Training and Awareness.

All staff members should familiarise themselves with this policy and the procedures, which have been implemented to support compliance with AML regulations. Superhumans will provide regular training and awareness programs to all employees, contractors, agents, and third-party service providers to educate them on money laundering and terrorist financing risks and how to identify and report suspicious activity.

4. Record Keeping.

Superhumans will maintain accurate and up-to-date records of all transactions and customer due diligence checks. Superhumans will keep these records for at least five years after the termination of the business relationship.

5. Risk Assessment

Superhumans will conduct a risk assessment periodically to identify potential money laundering and terrorist financing risks associated with its operations. Superhumans will also update its policies and procedures based on the results of the risk assessment.

6. Compliance.



Superhumans will conduct periodic internal reviews to ensure that all employees, contractors, agents, and third-party service providers comply with this AML Policy and applicable laws and regulations. Superhumans will also take appropriate corrective action if it identifies any violations.

7. Processing of refund.

Any approved refund, for whatever reason, will only be returned to the original payer via the same payment route it was received to the same account (if not cash) that it was paid from. This includes all credit debit card payments both domestic and international plus all direct bank transfers received into the Superhumans account.

8. Sanctioned Countries.

Superhumans regularly conducts reviews in conjunction with our banking partners regarding their ability and willingness to accept international payments from countries which are exposed to international sanctions. This regular review allows Superhumans to evaluate the risk of entering into business activity with individuals or entities from those countries.

Disclosure:

Any staff member who has suspicions of potential money laundering activity must complete the Suspected Anti-Money Laundering Reporting Form (Appendix A) at the earliest opportunity. Submit the reporting form to the Director. The report can be submitted confidentially by email, or by post, but any post must be enclosed in an envelope marked “Confidential – to be opened by addressee only” and placed within another envelope that bears no confidential marking. You can enclose any evidence you think may assist the Director in their investigations. It may be necessary to request further information from other individuals and their details should be noted in the ‘Other information’ section of the AML reporting form for the Director to take forward. Do not make any further enquiries yourself as to avoid inadvertently alerting anyone who may be involved, unless specifically asked to do so by the Director.

Where there are suspicions around the Director’s involvement in potential money laundering activity, the report should be directed to the Board.

Enforcement and Sanctions:

The approval of the Policy will be communicated through Director notes.

Department Directors are responsible for raising awareness of all new and updated policies through their normal Faculty/Directorate communication channels.

HR Team will work with Department Directors to identify appropriate provision of training, guidance and support to the implementation of this Policy.

It is imperative that line directors and employees follow the guidance within this Policy as failure to do so may result in disciplinary action and/or personal liability via legal proceedings.

Monitoring and Review:

The impact of this Policy shall be reviewed by the Director.

A Data Protection Impact Assessment has been carried out covering the personal data aspects of this policy.

Anti-Money Laundering Policy

Reviewed March 2023

Appendix A: AML Reporting Form:

Suspected Anti-Money Laundering – Reporting Form			
Name		Department	
Tel.		Email	
Details of suspected offence & offender(s)			
Name(s), address(es) & relationship with Superhumans			
Value & timing of activity involved.			
Nature of suspicions			
What investigation /enquiries have been undertaken to date & if anything, what has been established?			
Have you discussed your suspicions with anyone? If so, who, when and on what basis?			
Is any aspect of the transaction(s) outstanding and requiring consent to progress? (details)			
Other information (additional evidence, enclosures or commentary that may assist the MLRO)			
Date		Signature	

