

Directive

7.13 Fraud			
Source Document		Code of Conduct	
Content Owner		AkzoNobel Legal Group (ALG)	
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Purpose

The purpose of this Directive is to establish standards for preventing, detecting and appropriately responding to fraud and money laundering in order to limit the company's exposure to loss or damage resulting therefrom.

Scope and definitions

This Directive applies to all business units, functional and country management and all employees.

"Fraud" means a wrongful or criminal deception to obtain a financial or other benefit.

"Money laundering" means transforming the proceeds of crime to legitimate money or assets.

Directives

- 1. Employees shall follow all internal approval processes and accounting and financial reporting principles to ensure that all transactions, expenses and revenues are properly documented and recorded and that no payments are made without the appropriate approval and controls.
- 2. Employees shall not engage or allow others to engage in any kind of fraud, money laundering or irregular conduct.
- 3. Employees must be alert to threats or signs of fraud, money laundering and irregular conduct, both internal and external. Any suspicious transaction or activity shall be reported to management, the Compliance Officer and/or the ALG Compliance Function immediately. There shall be no retaliation against reporting a suspicious transaction in good faith.
- 4. Employees shall co-operate with internal or external investigation into fraud, money laundering or irregular conduct and shall maintain strict confidentiality in accordance with the applicable rules.
- 5. Management must ensure that effective internal controls are in place to prevent, detect and report fraud and to repair deficiencies and control damage.

Related documents

7.13.1 Rules on Fraud