

Anti-money laundering policy

A. Introduction & Scope

At House of HR (HOHR), we're fully committed to following all the laws against money laundering in Europe and around the world. Our aim is to stop people from hiding money they've gotten illegally and make sure it's not used for things like terrorism or other crimes. This Anti-Money Laundering (AML) policy lays out clear rules and steps to stop financial crimes, like money laundering and terrorist financing, in our company.

The purpose of this Anti-Money Laundering policy is to establish guidelines and procedures to prevent and detect money laundering and other financial crimes (including potential terrorist financing) within House of HR.

We're always looking at our AML strategies to make sure they're up to date with the laws and best practices in the industry. By making sure our business practices are fair and legal, we're not just protecting ourselves but also staying true to our commitment to being an ethical employer.

B. Scope

This policy applies to all individuals working at all levels and grades, including management, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to HOHR.

C. Policy

C.1. Definitions

Money laundering is a process through which individuals or entities attempt to conceal the origins of illegally obtained money, making them appear to be from legitimate sources. Money laundering is a serious criminal offense.

C.2. Management and controls

Here's what we're doing to prevent money laundering:

- We don't accept cash for payments. All client payments have to be made through wire transfer;
- Before we accept any payments, we check to make sure they match the invoices we've issued;
- We always verify our bank account details before any transactions;
- We make sure there's a contract in place before we start any work with a company or freelancer;

- We train our staff so they understand the risks of money laundering and know how to follow our AML policy;
- We have other policies in place, like ones against bribery and corruption, that support our efforts to prevent money laundering;
- If we see anything suspicious, we'll have it checked out by an impartial internal or external party.

By combining these internal measures, House of HR creates a comprehensive framework to mitigate the risk of money laundering and demonstrates a commitment to ethical business practices.

D. Roles and Responsibilities

All HOHR employees and associates are responsible for adhering to the principles and values set out in this policy. Everybody must familiarize themselves with this policy and participate in foreseen training/info sessions. Appropriate resources should be dedicated to the training and building of awareness to develop the knowledge and understanding of the anti-money laundering policy by HOHR.

The leadership of HOHR maintains a top down commitment to tackle money laundering. The management is abiding the above mentioned policies, principles and responsibilities and sets the tone at the top by disapproving any form of and implementing actions regarding money laundering. We have a zero-tolerance policy regarding engaging in activities related to money laundering. Failure to do so may result in disciplinary action up to termination of employment or termination of your business relationship with HOHR.

The ultimate responsibility for the policy, dissemination and update of the policy rests with the Compliance department. This anti-money laundering policy will be reviewed annually and revised as needed.

E. Raising your questions and concerns

House of HR wants to create and maintain a healthy, ethical and safe work environment. With that in mind, everyone can and should raise awareness if a violation of this policy is going on so that appropriate action can be taken. All reports will be treated confidentially and empathetically.

All breaches, questions, concerns and doubts can be raised via multiple channels:

1. The internet application "Spot": Spot allows you to raise sensitive issues in an accessible and, if desired, anonymous way. The customized workflow within Spot guides issue raisers throughout the process. Any issue will be addressed and followed up according to existing escalation procedures. Open the tool via talktospot.com/hohr or via the QR code.



2. You can contact your direct line manager or superior, the next level manager, the HR manager, your local compliance team or the person(s) of trust within your PowerHouse or Boutique.
3. If you believe the above channels to be insufficient or inappropriate, you can contact Abdel Bencheikh, the Group Risk and Sustainability Officer, (+ 33 6 95 39 39 15 or abdel.bencheikh@houseofhr.com) or to Astrid Heiremans, chairman of the audit committee of the Group (+32 475 900 458 or astrid.heiremans@finfactory.be).

In case of doubt or questions, please contact the Group Chief Risk and Sustainability Officer to review the matter.

Abdel Bencheikh

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