

## **Money Laundering Statement**

### **Introduction**

Money laundering is the process of concealing the criminal origin of money or other assets (such as raw materials), so they appear to come from a legitimate source. It is illegal, unethical and facilitates criminal conduct. Failure to address the risk of money laundering could undermine our reputation and lead to investigations, fines and/or other penalties for the company and/or individuals. This Anti-Money Laundering Policy sets out Ampco's approach to ensuring that we comply with all applicable laws and regulations to prevent money laundering and appropriately manage money laundering risks.

### **Who does this apply to**

This policy applies to all employees, directors and officers, as well as contractors under Ampco's direct supervision, working for an Ampco office or industrial asset directly or indirectly controlled or operated by Ampco worldwide. We assert our influence over joint ventures we don't control or operate to encourage them to act in a manner consistent with the intent of this policy.

### **What is our commitment**

We are aware of the risk of third parties exploiting us to engage in money laundering. We do not assist, support, participate in or permit money laundering or terrorist financing. We do not accept money or other assets if we know or suspect that they derive from any kind of criminal activity. We do not knowingly deal with criminals, suspected criminals or the proceeds of crime. We do not facilitate the acquisition, ownership or control of criminal proceeds or other assets deriving from criminal activity nor do we assist others in concealing criminal proceeds or assets. We do not tolerate tax evasion of any kind, and we do not knowingly or wilfully facilitate tax evasion. We implement procedures to prevent the facilitation of tax evasion by our people and others acting on our behalf.

To manage our money laundering risk exposure and ensure compliance, we implement several controls and processes. These include: • conducting know your counterparty and due diligence procedures to determine the background and identity of our counterparties; and • implementing controls in respect of payments we make and receive using a risk-based approach to ensure that they are consistent with the requirements of this policy. For

example, as a rule, we make all payments under our contracts to, and receive payments from, our contractual counterparties to avoid the risk of facilitating money laundering or tax evasion. We require employees to be alert to any unusual or suspicious arrangements which could expose us to the risk of money laundering or the facilitation of tax evasion, and to report such arrangements to Compliance.

### **Speak Openly and Raise Concerns**

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and require them to report any concerns regarding breaches of the Code of Conduct, our policies or the law, whether these relate to themselves or others. These concerns must be raised with managers, supervisors or via other available reporting channels, which includes dedicated whistleblowing contacts at our offices and industrial assets. Our Corporate Raising Concerns Programme channels are also available to employees, contractors and external parties. Ampco takes concerns seriously and handles them promptly. Ampco has zero tolerance for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or not in line with our Code of Conduct and policies, even if the concern isn't substantiated. There will not be any adverse consequences for anyone who raises a concern if they have not knowingly made a false report.

### **Consequences**

Our policies support our Values and Code of Conduct and reflect what is important to us. Ampco takes breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

Dann Konkin  
President & CEO  
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