



Payments by Third Parties ("Offshore Payments")

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Policy Statement

- **Westcon does not accept** payments from third parties in settlement of customer invoices
- This is due to the risk of becoming involved with tax evasion and / or money laundering; under the UK's Criminal Finances Act 2017, Westcon can be held liable for failing to prevent tax evasion occurring both in the UK and any other countries where we do business
- Limited exceptions are:
 1. Payment is being made by a professional and reputable finance provider pursuant to a facility they have granted the customer
 2. Payment made by a customer group company (under Parent Company Guarantee)
 3. Payment made by a particular end user where we have contractually agreed with the reseller to assign its payment obligation that arises from that particular deal to the end user in case of late payment or default. It also requires a solvency and background check of that end user
- Exceptions to this policy should only be made in exceptional circumstances at the discretion of: Catherine Mwololo (Africa / ME), Thomas Lenk (Europe) or Dave Corcoran (APAC). In relation to payments from Forex agencies in MEA, approval can be given for the onboarding and usage of a Forex agency without needing deal-by-deal approval
- Exceptions will always be subject to the normal KYC checks that we perform on the customer AND the third party will need to be registered on the group's onboarding platform in PartnerView (which contains the anti-bribery and ethics screening requirements)