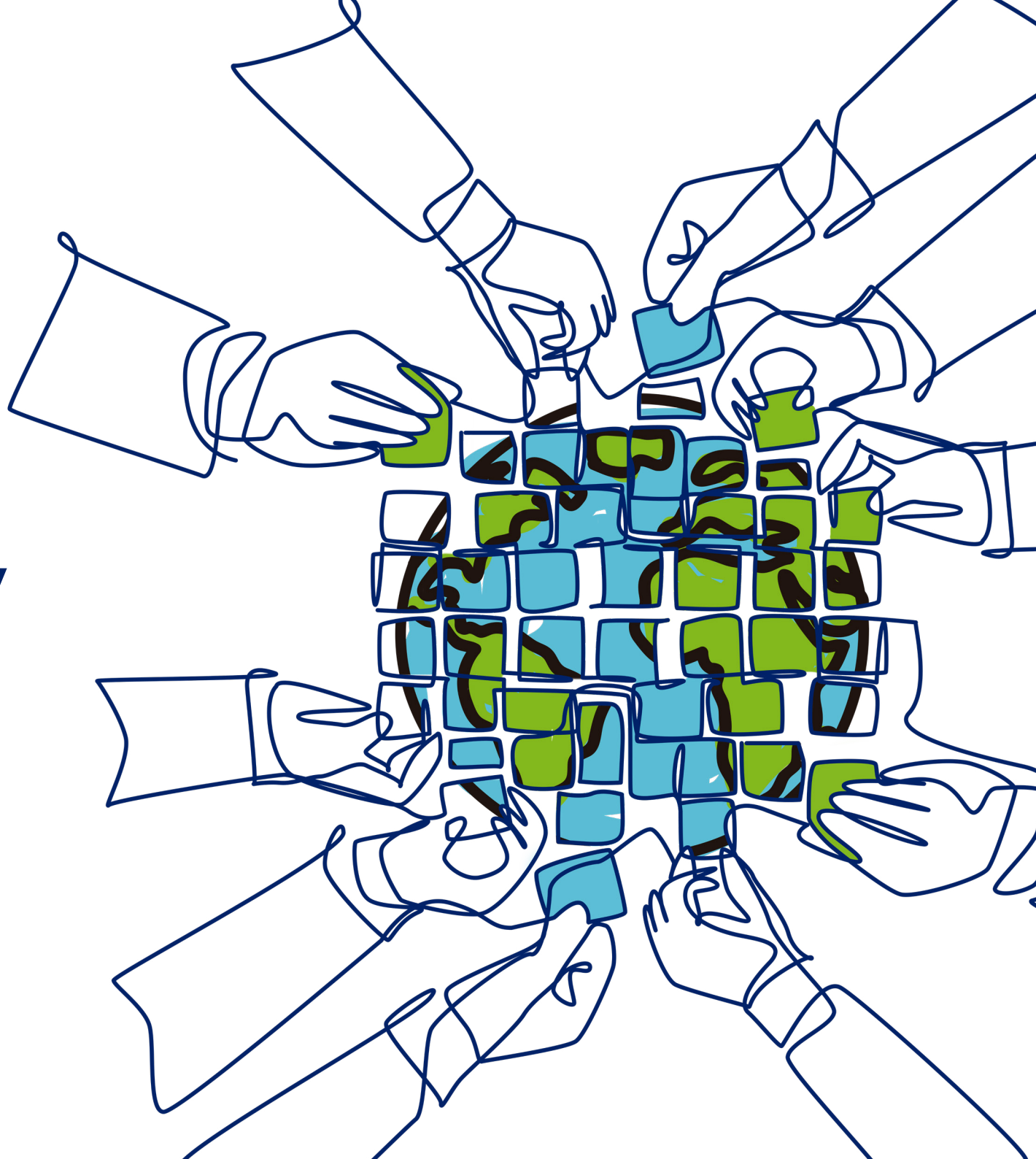




# ESG Sustainability Report 2022



## Presentation of Company's Activity

Overview .....	04
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## ESG Roadmap

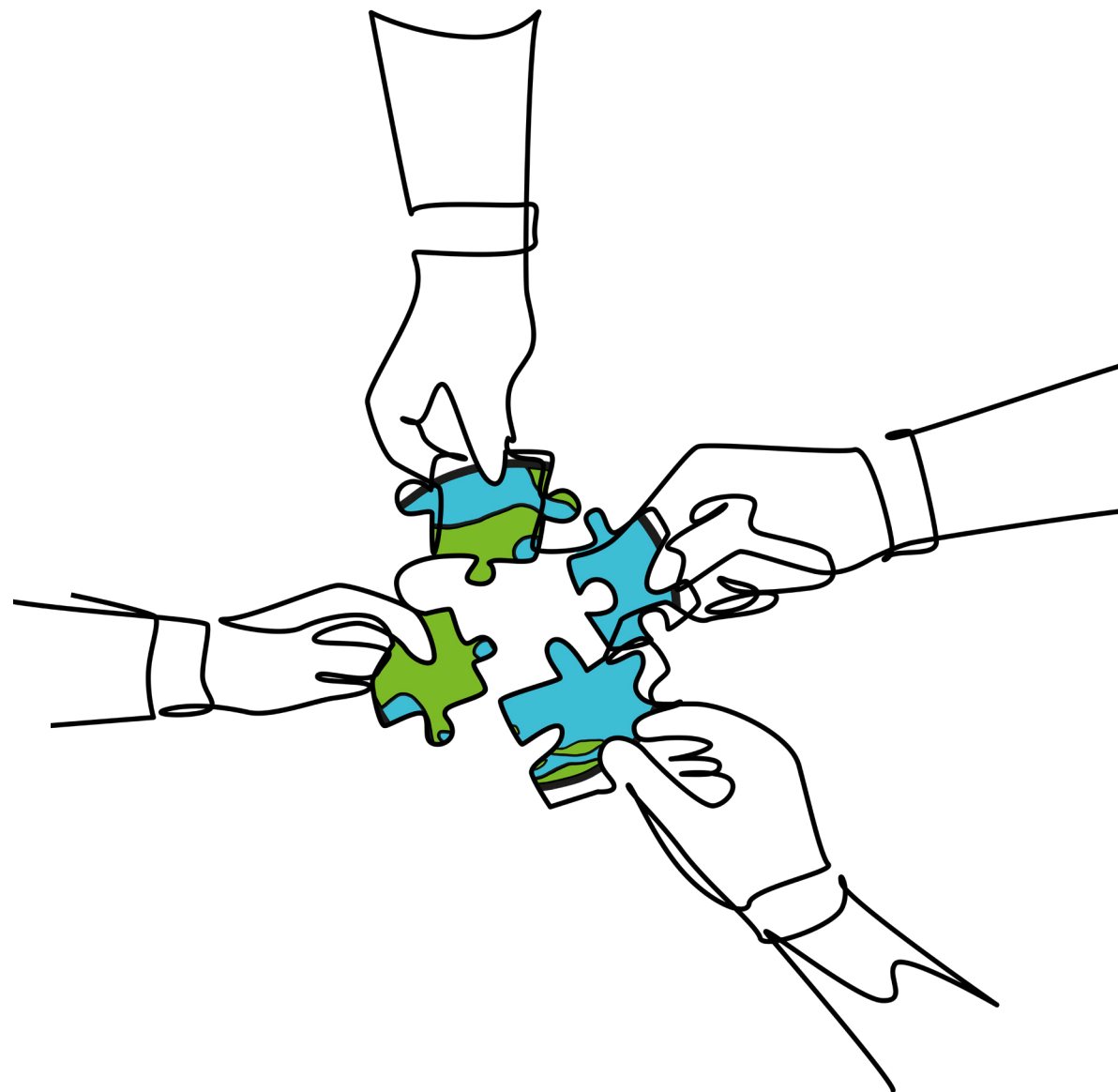
Health & Safety .....	06
Diversity & Gender Parity .....	07
Climate Change .....	07
Business Ethics .....	08
ESG Performance of Products and Services .....	09
ESG Performance of Services and the Impact on Society .....	10
2022 ESG Roadmap Highlights .....	12
Operating and Partnering with Purpose to Strengthen Global Financial Ecosystems .....	13
Empowering Individuals to Protect and Transform Communities .....	16
Cultivating Solutions That Protect the World's Most Vulnerable and Biodiversity .....	17

## Climate Approach

Climate Change Mitigation and Adaption .....	21
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Highlights 2022 .....	23
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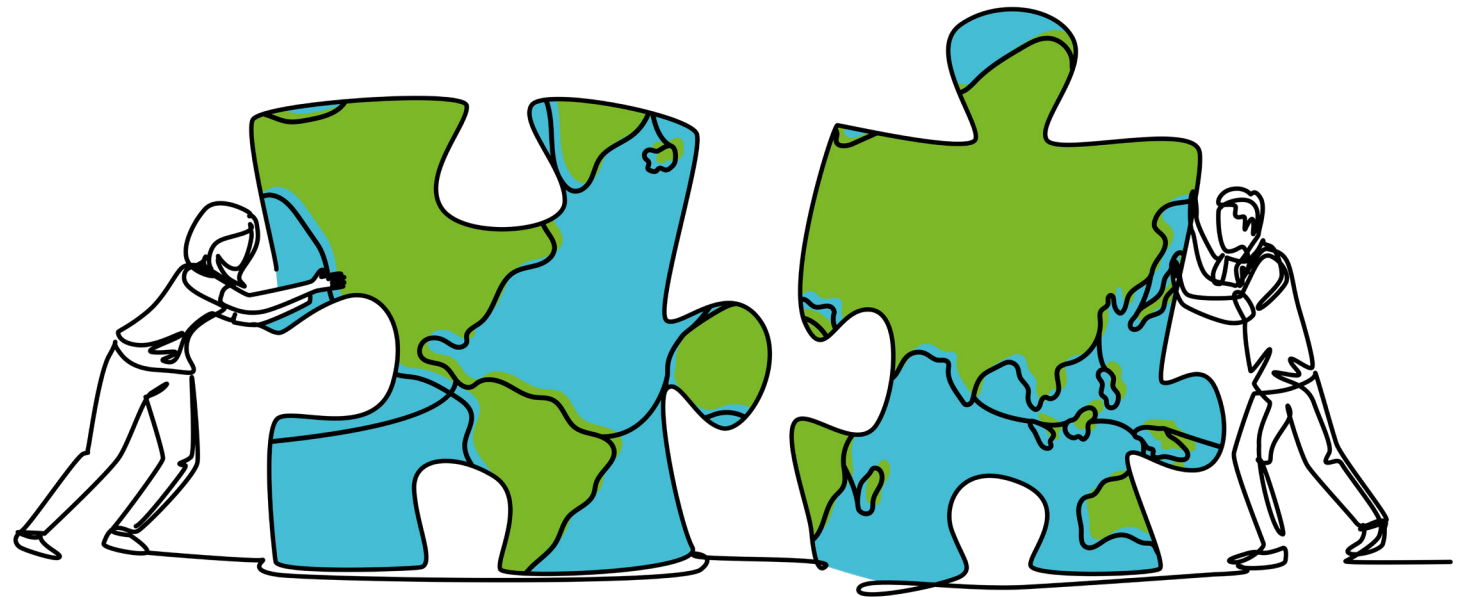
Methodology Notes .....	25
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# Presentation of Company's Activity

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Overview ..... 04



2022 marked a year of new possibilities at ACAMS, as the world-leading membership organization for anti-financial crime professionals officially became part of the Wendel Group portfolio of companies in March 2022. With this change, it brought new opportunities for how the organization operates yet with the same steadfast commitment to ACAMS' mission to end financial crime and drive strong environmental, social and governance (ESG) outcomes.

General Information



COMPANY ACTIVITY

Continuing **professional education**, best-in-class **peer networking** and **thought leadership** to fight illicit finance through **trainings** and **certifications** in the areas of anti-money laundering and financial crime prevention.

Employees



303  
employees



BREAKDOWN BY LOCATION (%)

18.1%	22.7%
EMEA	Asia-Pacific
59.2%	
Americas	

Other Information



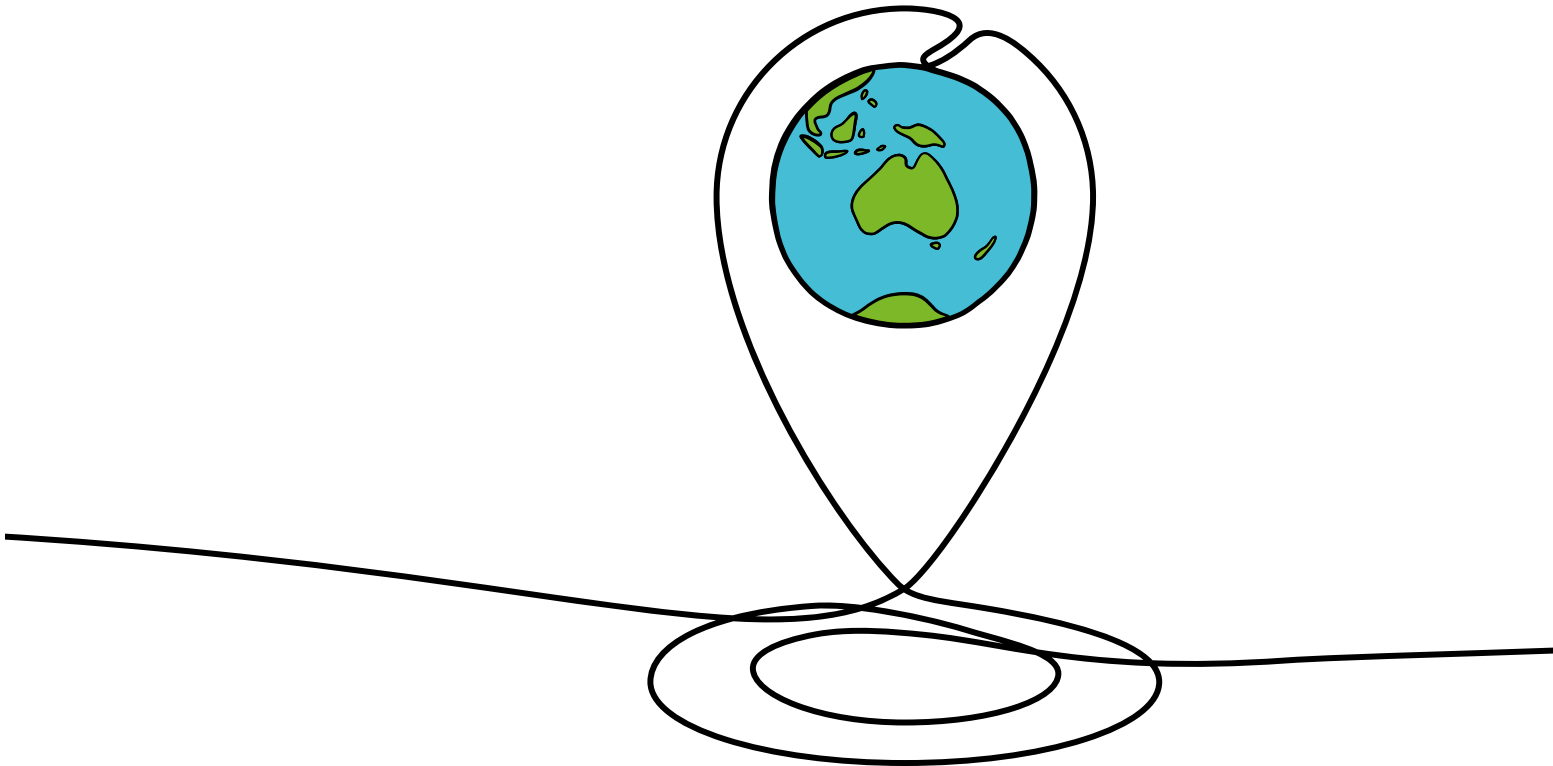
2002  
Year founded



2022  
Year acquired by Wendel

# ESG Roadmap

- Health & Safety .....06
- Diversity & Gender Parity ....07
- Climate Change .....07
- Business Ethics .....08
- ESG Performance of Products and Services .....09
- ESG Performance of Services and the Impact on Society ..... 10
- 2022 ESG Roadmap Highlights ..... 12
- Operating and Partnering with Purpose to Strengthen Global Financial Ecosystems ..... 13
- Empowering Individuals to Protect and Transform Communities ..... 16
- Cultivating Solutions That Protect the World's Most Vulnerable and Biodiversity.. 17



ACAMS is committed to cultivating platforms that improve and strengthen the quality of financial flows for the benefit of environmental, social and governance progress globally.

## Health & Safety

### RELATED TO THE COMPANY'S ACTIVITY



As a fully remote organization, ACAMS offers flexibility to its team. This flexibility comes with specific needs regarding engagement, motivation and mental health of the people working at ACAMS.



**60%**

of employees felt safe or very safe at work based on the annual employee survey.

### KEY COMMITMENTS



Develop and execute a comprehensive people strategy to address risks related to a fully remote working environment.



Organize and execute team building and engagement activities, with a focus on the leadership team meeting their global teams regularly.



Provide mental health support & access to wellness resources e.g. gyms and counseling.



Regional engagement committees to be supported and encouraged to continue facilitating in-person events.

# Diversity & Gender Parity

## RELATED TO THE COMPANY’S ACTIVITY



While ACAMS is currently well-represented and diverse, to maintain this diversity the organization is committed to having the best practices in place.

## KEY COMMITMENTS



Maintain a good gender balance.



43%

of women among board members.



49%

of women among managers.

# Climate Change

## RELATED TO THE COMPANY’S ACTIVITY



Climate change is a universal challenge. Employee travel generates carbon emissions (scope 3). ACAMS must demonstrate that it is making efforts to contribute positively to reducing carbon.

## KEY COMMITMENTS

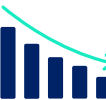


Measure its carbon footprint.



1,22

TCO2eq/employee  
Intensity of GHG emissions over the year (Scope 1, 2, 3).



Define a reduction target after this first year of carbon reporting.

## Business Ethics

### RELATED TO THE COMPANY'S ACTIVITY



Ethics is an absolute for ACAMS. The organization is committed to having the best standards in conducting business.



# 100%

of employees signed the Code of Conduct.\*

### KEY COMMITMENTS



Risk assessment interviews.



Release of a Code of Conduct.



Launch of ACAMS values - Purpose, Integrity and Partnership - to reinforce importance of integrity at the workplace.

*\*Data reflects governance under prior ownership from Adtalem Global Education.*



## ESG Performance of Products and Services

### RELATED TO THE COMPANY'S ACTIVITY



The ACAMS' ecosystem and ESG programs share a common goal of improving the quality of financial flows.



**48**

Net promoter score.



**194**

Jurisdictions covered.



**100,620**

ACAMS members.



**62,927**

AFC professionals certified during the year.



**45%**

of products updated over the year.

### KEY COMMITMENTS



Ensure excellence and reliability of our trainings by being at the forefront of new regulations.



Ensure products are regularly updated, reflecting the latest legislative and regulatory changes.



Maintain best-in-class global faculty for conferences and training.



Ensure the examination process is robust with guidelines in place to monitor leaks.



Develop easily accessible social impact training.



**6,606**

Enrolled in free social impact training - Ending Illegal Wildlife Trade.



**14,442**

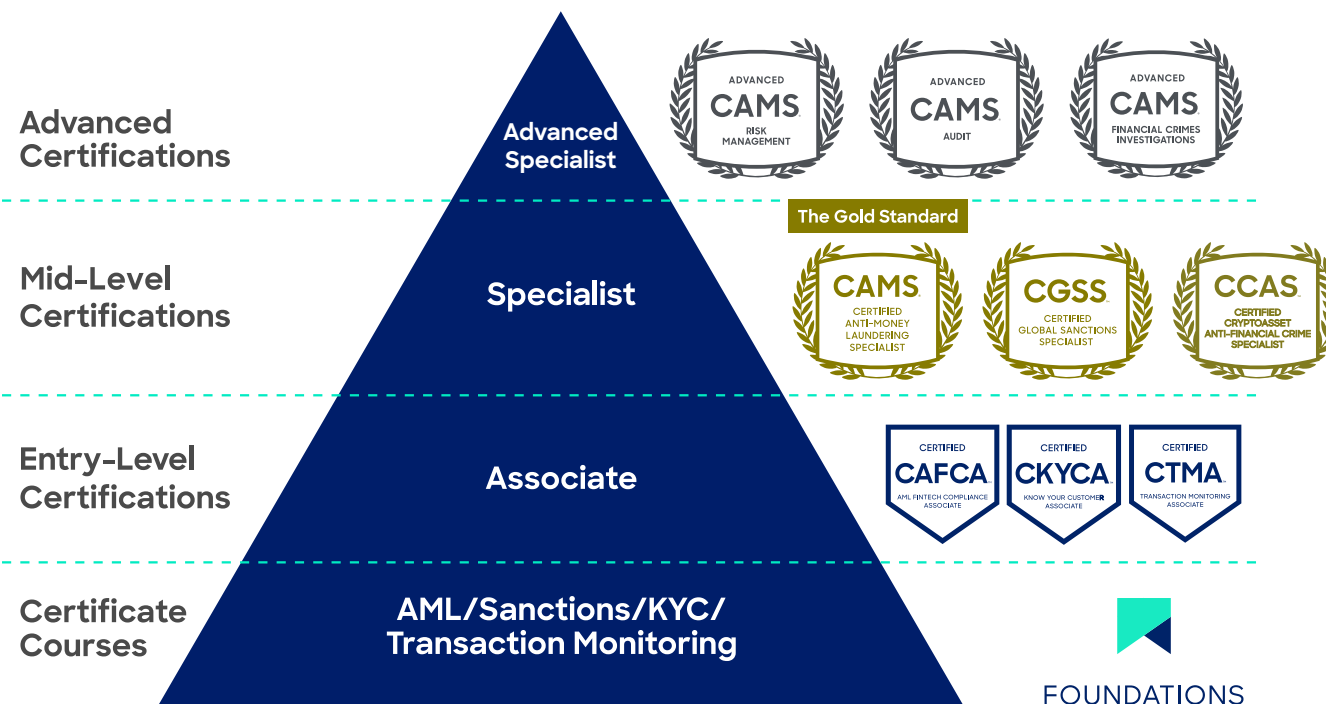
Enrolled in free social impact training - Ending Human Trafficking & Modern Slavery.

## ESG Performance of Services and the Impact on Society

ACAMS remains steadfast in its mission to fight financial crime, and ultimately aid in stopping the subsequent harm to the world that is associated with illicit finance, such as modern-day slavery and the illegal wildlife trade. Reducing financial crime would have a profound impact on society as a whole, helping to promote national security and financial integrity, protect the lives of would-be victims, and mitigate environmental damage and its knock-on effects.

Through its training programs, certifications & certificates, global peer-to-peer networking events and thought leadership initiatives, ACAMS' ability to improve and strengthen financial flows, and protect the world's most vulnerable populations and biodiversity, remains unparalleled across the industry. ACAMS operates with a great sense of pride and responsibility to its mission and the stakeholders it serves.

### ESG ROADMAP



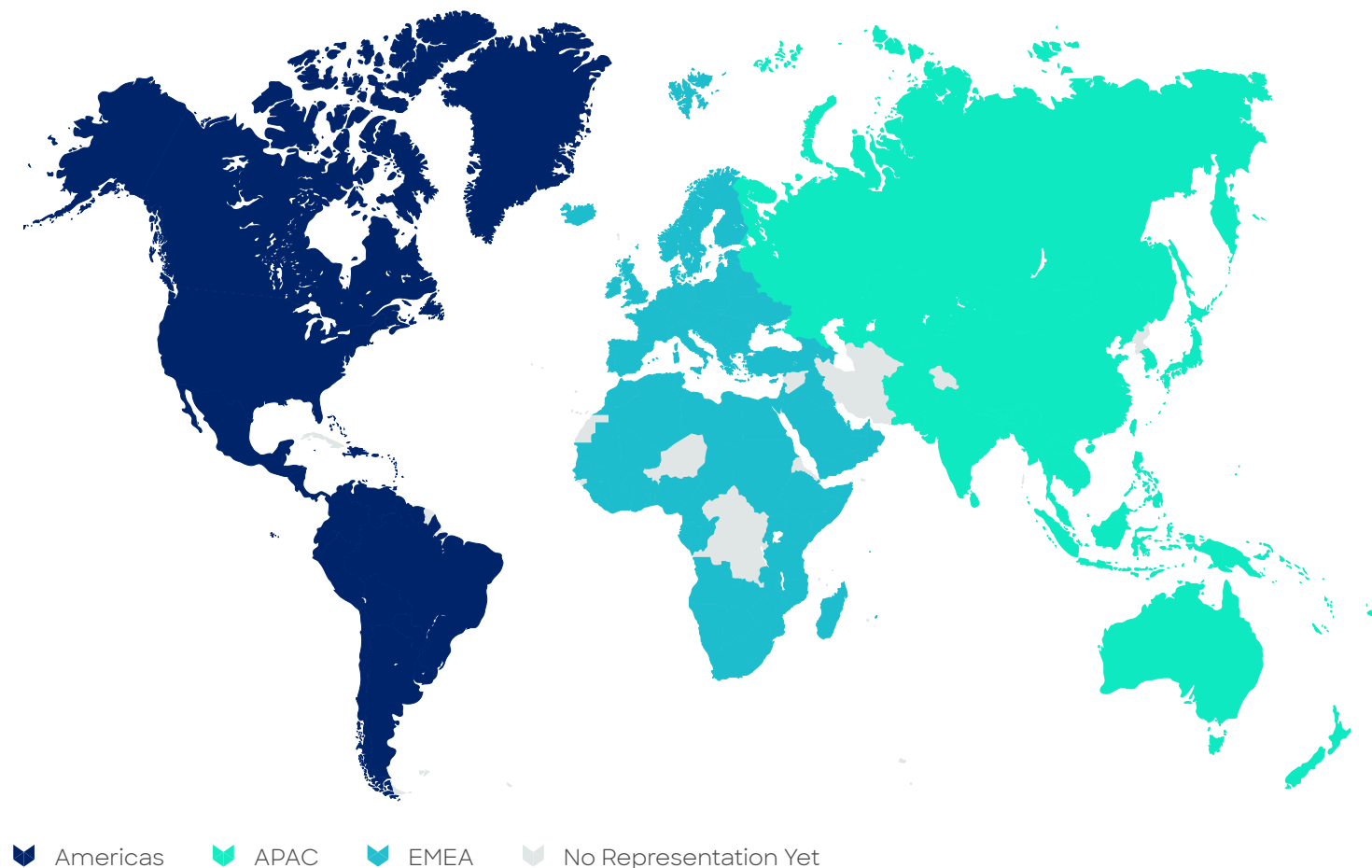
## ESG Performance of Services and the Impact on Society (cont.)

### ESG ROADMAP

With over **100,000** members spread across more than **180** jurisdictions, and more than **63** global chapters, ACAMS advanced its mission in impactful ways this past fiscal year through the launch of more than **70** new or updated certifications and certificates, and more than **10** large-scale events hosted across the Americas, EMEA and APAC. Its best-in-class expertise, global faculty and strong talent equips the organization with a competitive advantage and solutions that serve in advancing its mission and delivering societal impact.

By educating, informing, and convening the anti-financial crime (AFC) community, and through its flagship events and seminars, training programs, certifications and certificates, ACAMS is making an outsized impact on the economic and social progress of communities around the world.

### ACAMS Global Membership



2022 ESG ROADMAP  
HIGHLIGHTS



## Operating and Partnering with Purpose to Strengthen Global Financial Ecosystems

The organization's impact is expanded further by its facilitation of cross-sector collaboration and partnerships.

Notably in 2022, ACAMS joined forces with **several respected partners to safeguard the integrity of the financial system**, including FELABAN, Latin America's leading banking federation. ACAMS and the Bogota-based organization collaborated on training AFC professionals throughout Latin America on compliance best practices and emerging risks related to money laundering and other forms of illicit finance. The initiative offered globally recognized ACAMS training certifications to compliance practitioners **across 18 Latin American countries** and more than **600** of FELABAN's member institutions in the region's banking and payments sectors.



The same year, ACAMS and U.S. Homeland Security Investigations (HSI) partnered on a **ground-breaking report to combat organized retail crime**, the large-scale theft of retail merchandise with the intent to resell items for financial gain, which is a growing economic and public-safety concern.



The joint report – *Detecting and Reporting the Illicit Financial Flows Tied to Organized Theft Groups and Organized Retail Crime* – highlights red flags associated with organized theft groups, including structured deposits and withdrawals, large purchases of stored-value cards, high-dollar wire transfers tied to wholesale companies involved with health and beauty supplies, and large purchases of lighter fluid or heat guns, among others. The report also serves as a guide for law enforcement investigators and anti-financial crime (AFC) professionals, outlining how organized theft groups steal and resell retail goods through online marketplaces and front companies and launder an estimated \$69 billion in illicit profits through the U.S. financial system and trade-based money laundering (TBML) schemes each year.

## Operating and Partnering with Purpose to Strengthen Global Financial Ecosystems (cont.)

As part of its efforts to mitigate the illicit-finance risks associated with blockchain technology, ACAMS launched **a new training certification for AFC professionals engaged with the virtual-asset sector**, the *Certified Cryptoasset Anti-Financial Crime Specialist (CCAS)* credential. Designed to support AFC practitioners across array of stakeholder organizations – from virtual-asset service providers to law enforcement agencies to banks – CCAS trains candidates on topics and strategies to prevent the criminal exploitation of cryptoassets and shield firms from regulatory risks and reputational harm.

Through coursework focused on anti-money laundering (AML) controls and risk-management policies and procedures, learners master such topics as the types and characteristics of different blockchains, common illicit-finance typologies in the crypto space, Know-Your-Customer standards and best practices, strategies to monitor and track related blockchain payments, and relevant applications of machine-learning and artificial-intelligence tools.



## ACAMS RISK ASSESSMENT

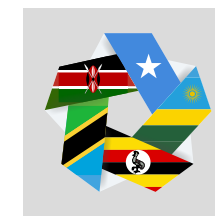
Additionally, as part of its efforts to strengthen anti-money laundering (AML) programs around the world, ACAMS, during the period under review, launched a new module of its **ACAMS Risk Assessment™ software**-as-a-service solution for money services businesses (MSBs), including those offering virtual-asset products and services. The new module gives MSBs a standardized means of understanding, measuring, and explaining the money laundering risks impacting their business via a comprehensive view of their AML, Sanctions, and Suspicious Activity control programs. Utilizing a risk-based approach, the software solution helps institutions to assess and measure their money-laundering risks across products, services, delivery channels, customer types, and geographies.



## Operating and Partnering with Purpose to Strengthen Global Financial Ecosystems (cont.)

ACAMS Chapters are a testament to the simple truth that financial institutions and governments are most effective at fighting illicit finance when they collaborate, communicate and partner with one another. Through ACAMS Chapters, **AFC professionals have a network of peers that can work together in identifying and reporting money laundering, terrorist financing, sanctions evasion, and other illicit activity in their respective regions.** Chapter members can build on their compliance knowledge to better mitigate their institutional risks, protect those vulnerable individuals who have fallen victim to criminal groups, and ultimately save lives.

In 2022, two new chapters were established in Italy and East Africa, bringing ACAMS' total number of chapters to **63**. The ACAMS East Africa Chapter is co-located in Kenya, Rwanda, Somalia, Tanzania and Uganda.



Each Chapter provides a platform for the education and professional development of AFC and sanctions compliance practitioners and aims to drive collaboration among private-sector institutions, regulatory bodies, law enforcement agencies, and other organizations engaged in combatting illicit finance.



## Empowering Individuals to Protect and Transform Communities

**ACAMS believes that diverse perspectives and cultural experiences help strengthen the world around us. Across the financial sector, diversity enables different perspectives to drive new solutions to problems, ultimately reducing risks, strengthening compliance, and protecting our global communities.**

In support of this perspective, ACAMS seeks to drive long-term change that enables diverse perspectives to flourish. This includes creating opportunities for underrepresented professionals pursuing a career in financial-crime prevention.

ACAMS remains eager and intentional in serving as a change agent across various diversity, equity, and inclusion (DEI) issues. In 2021, as part of its wider DEI commitment, it launched the **ACAMS scholarship awards to better equip and empower professionals from diverse backgrounds to advance their financial crime prevention careers.**

ACAMS continued its efforts in 2022 with the launch of a **new scholarship program**, specifically designed for minority professionals seeking to enroll in the new *Certified Cryptoasset Anti-Financial Crime Specialist* (CCAS) certification program. This past year garnered more than **679 applicants across 100 countries.**

Through its scholarships, and with more than **60 awarded to date**, ACAMS aims to advance and elevate the personal and professional development of aspiring BIPOC compliance professionals by:



creating development opportunities to acquire globally recognized qualifications



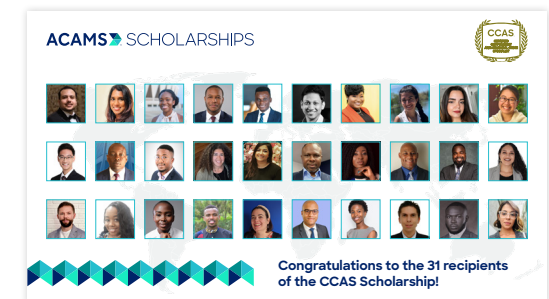
helping to expand their compliance toolkit to address emerging threats and trends in anti-financial crime



providing a platform for peer-to-peer networking and mentorship

Scholarships are selective and based on various factors. Award recipients must demonstrate a passion for compliance and cryptoassets, and have a deep commitment to create a positive impact in both their personal and professional growth by completing the CCAS Certification. Additionally, all awarded recipients must exude ambition, drive, and passion.

As a large international membership organization with over 100,000 members across 180 jurisdictions, scholarship recipients join a dynamic global community of like-minded professionals that aim to enhance and protect their organizations and communities in which they live and work. Scholarship recipients also benefit from the global visibility and recognition that ACAMS' global platforms provide.





## Cultivating Solutions That Protect the World's Most Vulnerable and Biodiversity

**Anti-financial crime professionals are in a unique position to protect not only the integrity of the financial system, but also the global ecosystem, as they investigate the transactional and trade networks used by criminal syndicates to generate billions of dollars in illicit proceeds every year.**

To remove barriers to continuing professional education and to expand access to guidance on the latest threats impacting society and our global communities, ACAMS, in partnership with several global specialist organizations – Finance Against Slavery & Trafficking (FAST) Initiative at the United Nations University Centre for Policy Research (UNU-CPR), World Wide Fund for Nature (WWF), Basel Institute on Governance, United for Wildlife, The Royal Foundation of The Prince and Princess of Wales – **first launched a series of free-of-charge social-impact certificates to fight human trafficking and the illegal wildlife trade in 2020.**



Subsequent additions were made in 2021 with the support of the Wildlife Justice Commission and the Polaris Project.



### SINCE THE LAUNCH OF THE SOCIAL IMPACT CERTIFICATES



More than  
**40,000+**  
Individuals Enrolled



Across  
**150**  
Countries

These certificate courses teach compliance and anti-money laundering (AML) professionals **how to identify and track financial activity linked to the illegal wildlife trade and modern slavery**, as well as how they can safeguard against the exploitation of the formal financial sector. Ultimately, participants learn how to flag and investigate financial flows potentially linked to the estimated \$23 billion in illicit IWT proceeds generated each year.

In 2022, ACAMS further expanded the reach of its *Ending Illegal Wildlife Trade – A Comprehensive Overview* certificate program with translations in both Simplified Chinese and Japanese.



## Cultivating Solutions That Protect the World's Most Vulnerable and Biodiversity (cont.)

Additionally, ACAMS established a partnership with TRAFFIC, a leading non-governmental organization that works to ensure wildlife trade is not a threat to the conservation of nature. Through this partnership, ACAMS enabled the localization of vital trainings in key markets – China and Japan – to propel efforts related to ending illegal wildlife trade by launching the *Ending Illegal Wildlife Trade - A Comprehensive Overview* certificate in Simplified Chinese (SCH) and Japanese.

### ESG ROADMAP



**ACAMS** 

**違法な野生生物  
取引の撲滅**

無料オンライン認定トレーニングコース

IWT撲滅に向けて

サポーターパートナー：  
 BASEL INSTITUTE ON  
GOVERNANCE



**ACAMS** 

**预防和打击非法  
野生动植物贸易**

免费在线课程

行动起来，  
共同打击非法野生动植物贸易

本课程得到以下合作伙伴支持  
  BASEL INSTITUTE ON  
GOVERNANCE



## Cultivating Solutions That Protect the World's Most Vulnerable and Biodiversity (cont.)

**Geopolitical trends and events, including the rise of virtual assets and the COVID-19 pandemic, have resulted in new ESG-related activities at ACAMS.**

Furthermore, in June 2020 and later in July 2021, the Financial Action Task Force (FATF) published guidance on the illegal wildlife trade and environmental crime, heralding interest to incorporate ecological issues. When added to existing published research on human trafficking, labor exploitation, illicit gold mining, and financial inclusion, it is clear ESG will play a larger role in anti-financial crime as it intersects with FATF's guidance on environmental and social issues. The aim of both anti-financial crime and ESG is to improve the quality of financial flows while promoting sustainability and responsibility.

As a result, ACAMS synthesized these findings and recommendations in its 2022 whitepaper – which was also translated to Simplified Chinese – *Environment, Social, and Governance (ESG) and Anti-Financial Crime (AFC) Convergence Managing AFC Risk: Applying the ESG Framework to Stop Illicit Financial Flows*.

**The whitepaper aims to deliver upon a few key areas:**

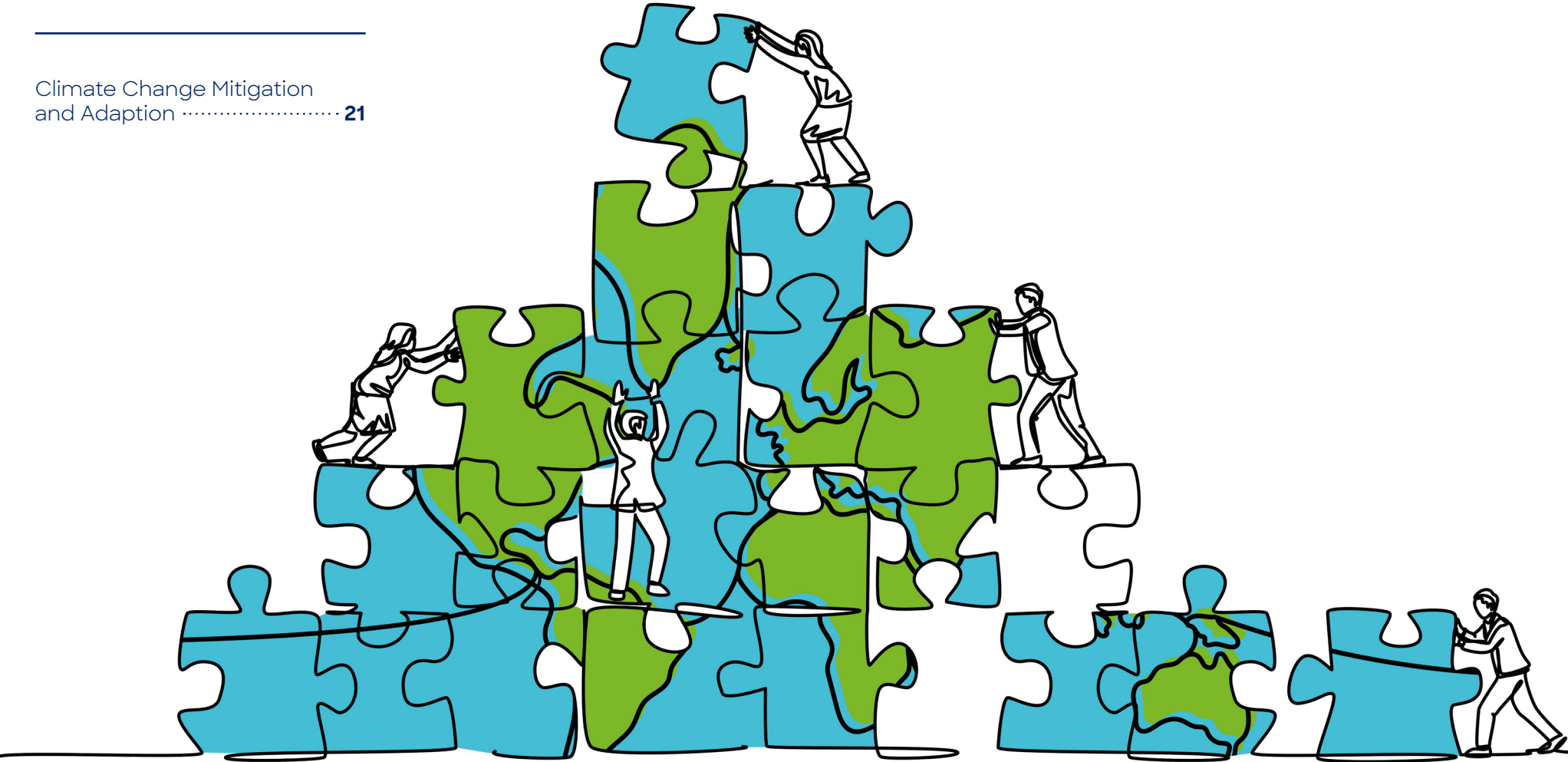
- (1) help AFC professionals to understand the role they can play in helping organizations build-out ESG functions;
- (2) link current AFC processes to ESG frameworks;
- (3) share lessons learned from AFC deployments to make a meaningful impact to save the planet.

Additionally, ACAMS further offered ESG-related guidance and expertise at events with the session: *It's Only Natural: Using ESG Practices to Manage Financial Crime Risk*. This panel session, which incorporated a regulator, New York Department of Financial Services and industry leaders, provided perspectives and counsel on how to utilize financial intelligence to identify high risk customers with ties to environmental crimes that hasten climate change, such as illegal logging and waste trafficking, how to integrate ESG protocols into risk management models to strengthen oversight in areas such as supply chain investigations and detect criminal activities such as trafficked labor, and how to stay up to date with the latest ESG regulations, including the Federal Reserve's new reporting requirements, and adjusting institutional risk management system accordingly.



# Climate Approach

Climate Change Mitigation  
and Adaption ..... 21



## Climate Change Mitigation and Adaption

In 2022, under the guidance of Wendel, ACAMS completed its first carbon footprint analysis. This first exercise confirms that ACAMS' activity is very low carbon intensive. CO<sub>2</sub> emissions per employee are only 1.22 tons per employee.



# 1,22

tCO<sub>2</sub>eq/employee

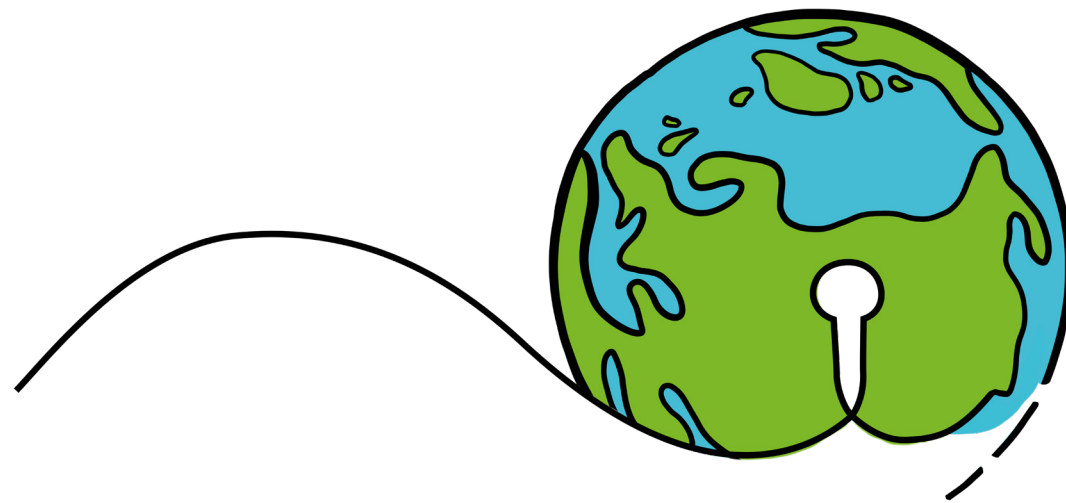
For the fiscal year 2022, ACAMS was a fully remote organization and will continue being so for the foreseeable future. Employees have access to global pods located in three continents – Americas, APAC and EMEA. The Americas pod which is located in Washington DC also serves as the global HQ. Emissions on scopes 1 and 2 are therefore considered as null. Emissions related to energy consumption used by computers when employee work from home have been estimated in scope 3.

The most significant emissions are related to business travel for the purpose of attending ACAMS conferences, business meetings and convening events such as public-private sector roundtables. They represent 81% of total ACAMS emissions.

### ACAMS' Carbon Footprint Analysis

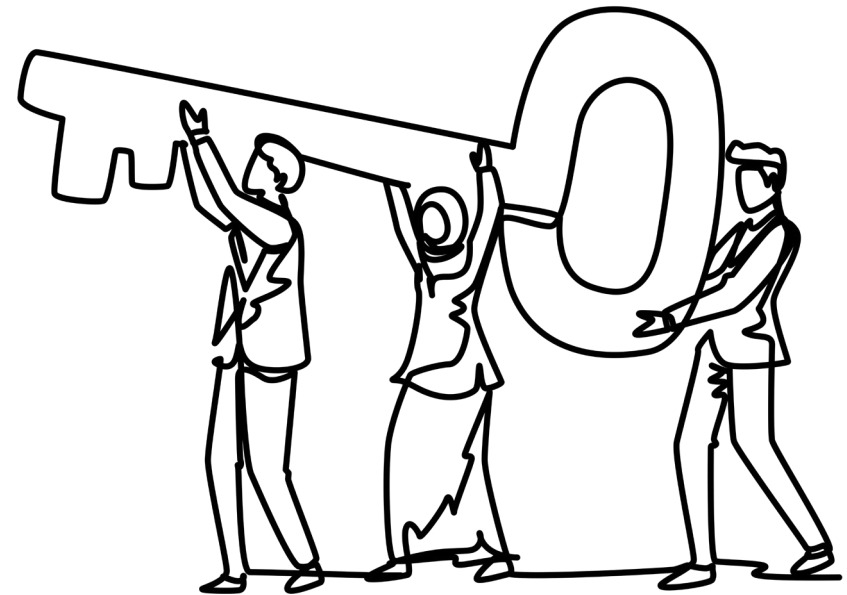
Scope	2022	Comment
Scope 1 (tCO <sub>2</sub> eq)	0	In 2022, ACAMS was a fully remote organization
Scope 2 (tCO <sub>2</sub> eq)	0	
Scope 3 (tCO <sub>2</sub> eq)	371	81% related to business travel (cat. 6) 17% related to employee commuting (cat. 7) 1% related to purchased goods and services (cat. 1)
Intensity of 1, 2, 3 emissions per employee (tCO <sub>2</sub> eq/ employee)	1,22	

Given this first carbon footprint assessment exercise and its low carbon intensity, ACAMS has not yet defined an emission reduction target.



## Highlights 2022

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In March 2022, ACAMS was acquired by the Wendel Group, which brought new opportunities to the structure and governance of the organization, and with the help of several key senior leadership appointments, made significant progress to transition to a standalone organization and further build capacity for agility, growth, and impact for the years to come.



As part of its capacity building, the organization focused on the build out of standalone support services teams – such as human resources, legal, finance and IT – to further enable progress for business ethics and the health, safety, and wellbeing of employees.



Human Resources



Legal



Finance



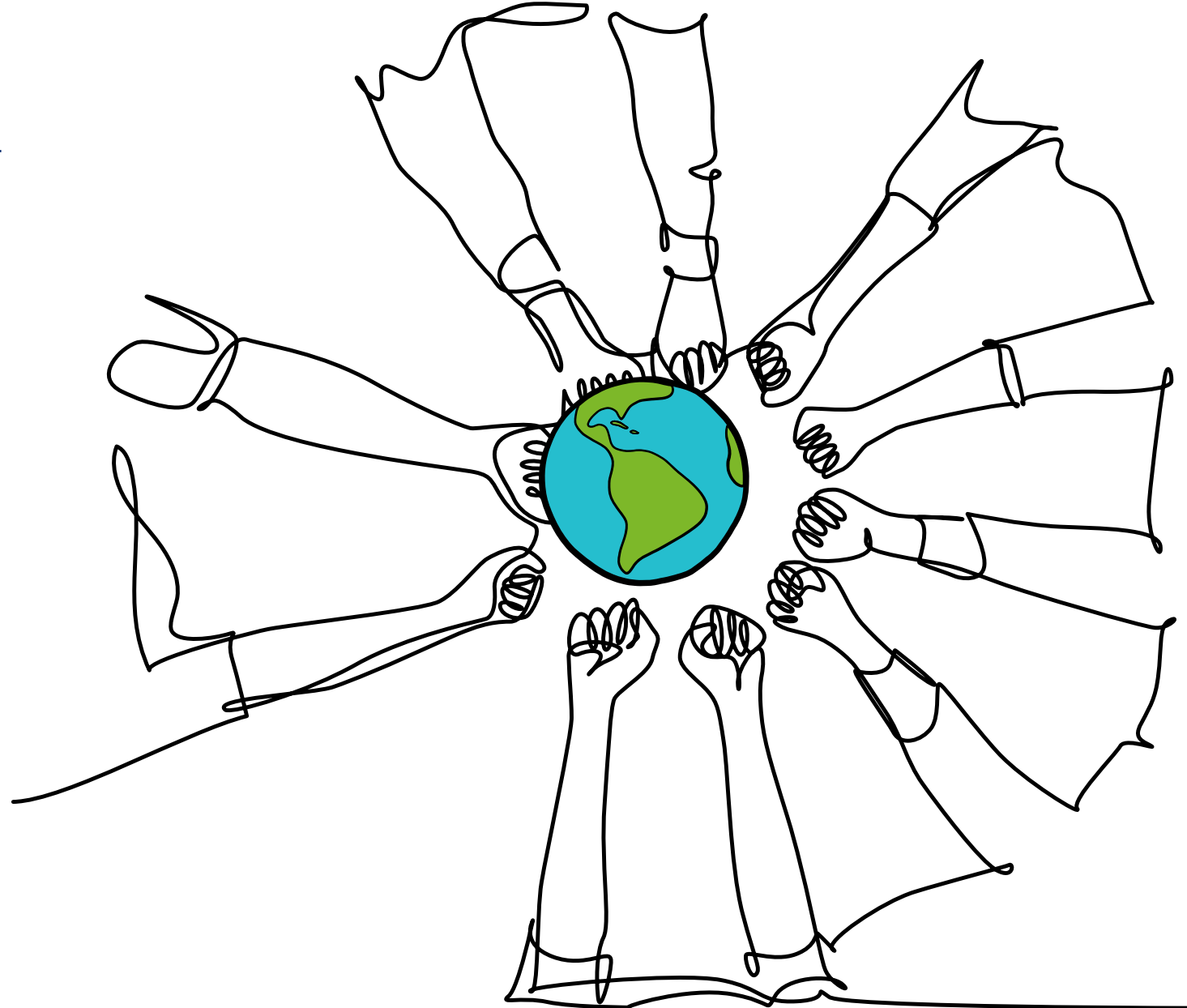
IT

Additionally, through the integration with the Wendel Group, ACAMS established its first ever ESG roadmap and carbon-footprint analysis that will be fundamental in driving performance and societal impact for years to come.



## Methodology Notes

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## Reporting Period



The period selected for 2022 annual reporting is the calendar year from **January 1 to December 31, 2022**.

## Reporting Perimeter



The scope of reporting covers **100%** of ACAMS employees.

## Reporting Standards and Choice of Indicators



To monitor the progress of its environmental, social and societal performance, ACAMS has adopted key performance indicators that are material for ACAMS and consistent with the CSR commitments at the Wendel Group level.

The ESG risk matrix presented below has been validated by the Audit Committee in November 2022.

ESG KPI data are presented for a single year, as this is the first year of ESG reporting. For this first year of reporting, ACAMS' non-financial data was subject to a mock audit.

Greenhouse emissions are calculated and reported according to the GhG protocol standard. Scope 3 only includes business travels of employees, work-from-home energy use and some service purchases. It does not include emissions related to the travel of participants to training courses or conferences organized by ACAMS, and does not include all purchases of products and services.

## Specific Indicators' Definitions

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### TURNOVER RATE:

The formula used is: “Number of terminations”/”Headcount at year-end.” It excludes interns and temporary employees.

---

### NUMBER OF JURISDICTIONS COVERED:

A jurisdiction is considered as ‘covered by ACAMS’ if ACAMS had at least one transaction in that jurisdiction over the past year.

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### NUMBER OF *ENDING ILLEGAL WILDLIFE TRADE CERTIFICATES ‘PURCHASED’* AND NUMBER OF *ENDING HUMAN TRAFFICKING & MODERN SLAVERY CERTIFICATES ‘PURCHASED’*:

These certificates are sold for 0 USD.

---

### EMPLOYEE ENGAGEMENT

(% of employees covered by the annual pulse and engagement surveys to gauge engagement levels, % of employees that feel satisfied or very satisfied at work during the annual employee survey):

These indicators are calculated and provided by an external third-party.

---

### NET PROMOTER SCORE:

This indicator is calculated and provided by an external third-party.