



Delphine Reuter <dreuter@icij.org>

ICIJ - Follow-up Media Comment Request

OMC Corporate <corporate@omcgroup.com>
To: Delphine Reuter <dreuter@icij.org>

Fri, Sep 24, 2021 at 11:25 PM

Dear Ms. Reuter –

Thank you again for your correspondence of September 15th. We have reviewed your inquiry and our response is as follows:

OMC is committed to compliance and maintains a robust compliance program, including due diligence policies and procedures. We comply with all applicable laws in the jurisdictions in which we operate, and cooperate with regulators and law enforcement in all inquiries and investigations. We strive to exceed standards and are proud of the work we do.

Our policies and procedures contain proprietary and confidential information. The success and effectiveness of OMC's policies and procedures lie in their confidentiality. Indeed, as you are well aware, bad actors seeking to conduct financial crimes often attempt to learn how service providers screen clients in an effort to evade their system of controls. Disclosure of Company policies and procedures would be detrimental to our existing due diligence processes.

Furthermore, as a service provider, we maintain sensitive information about our clients and have an obligation to our clients to keep information confidential. We respect our clients' right to privacy and the trust that our clients have in us.

We would also like to note that your questions appear to be based on false, inaccurate, or misleading information and assumptions. We request that you verify the veracity of your sources and records as you continue your investigation.

Thank you,

OMC Group

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