



## BUSINESS PROCESSES

CONTROL FOR OPERATIONS / PAYMENTS VENDORS  
WITH BANK ACCOUNT IN COUNTRIES OF EU BLACK  
LIST

# INTRO

## Purpose

The objective of this process is to establish a control for the operations/payments made to suppliers with bank accounts in countries of EU black list, in order to mitigate risks related to the money laundering policy."

## Controls

The controls (Compliance Area Approval) will be established before the request to create the supplier in SAP and before the creation of the order in SAP:

- ✓ The approval of the Vendor Creation will be attached to the request in SAP
- ✓ The approval of the Purchase Order will be included in the payment request of each invoice (JIRA)."

## Who is responsible?

HQ Area Responsible	Compliance Area
<p>1. <b>Product Safety:</b> Ensuring that all products meet safety standards and regulations.</p> <p>2. <b>Quality Control:</b> Implementing rigorous quality control measures to ensure product consistency and reliability.</p> <p>3. <b>Customer Satisfaction:</b> Monitoring and responding to customer feedback to improve product quality and service.</p> <p>4. <b>Regulatory Compliance:</b> Staying up-to-date with local and international regulations to ensure legal compliance.</p> <p>5. <b>Supply Chain Management:</b> Managing the supply chain to ensure timely delivery of materials and components.</p>	<p>1. <b>Legal Compliance:</b> Ensuring that all business operations comply with applicable laws and regulations.</p> <p>2. <b>Environmental Compliance:</b> Implementing measures to reduce environmental impact and comply with environmental regulations.</p> <p>3. <b>Financial Compliance:</b> Ensuring accurate financial reporting and adherence to accounting standards.</p> <p>4. <b>Human Resources Compliance:</b> Managing employee relations, including recruitment, training, and benefits, in compliance with labor laws.</p> <p>5. <b>Data Privacy:</b> Protecting customer and company data in accordance with data protection regulations.</p>

CS Area Responsible	PTP Area
<p>1. <b>Customer Service</b></p> <p>2. <b>Product Quality</b></p> <p>3. <b>Logistics</b></p> <p>4. <b>Marketing</b></p> <p>5. <b>Finance</b></p> <p>6. <b>Human Resources</b></p> <p>7. <b>Information Technology</b></p> <p>8. <b>Legal</b></p> <p>9. <b>Compliance</b></p> <p>10. <b>Environmental</b></p> <p>11. <b>Social</b></p> <p>12. <b>Governance</b></p>	<p>1. <b>Product Quality</b></p> <p>2. <b>Logistics</b></p> <p>3. <b>Marketing</b></p> <p>4. <b>Finance</b></p> <p>5. <b>Human Resources</b></p> <p>6. <b>Information Technology</b></p> <p>7. <b>Legal</b></p> <p>8. <b>Compliance</b></p> <p>9. <b>Environmental</b></p> <p>10. <b>Social</b></p> <p>11. <b>Governance</b></p>

Hotel GM Treasury Area

## Where?

This document is based in the process that is available in the Business Processes section of our Digital Knowledge Workplace in the following link: <https://nhorganization.nh-hotels.com/content/control-operations-payments-vendors-bank-account-countries-eu-black-list>

## Countries of EU black list\*

1. Samoa Americana – Bank country AS
2. Fiji - Bank Country FJ
3. Guam – Bank country GU
4. Palaos - Bank Country PW
5. Panama – Bank country PA
6. Samoa – Bank country WS
7. Trinidad and Tobago – Bank country TT
8. United States Virgin Islands – Bank country VI
9. Vanuatu – Bank country VU
10. Russia – Bank Country RU
11. Bahamas (The) – Bank Country BS
12. Anguilla – Bank Country AI
13. Turks and Caicos Islands (the) – Bank Country TC
14. Costa Rica – Bank Country CR
15. Virgin Islands (British) – Bank Country VG
16. Marshall Islands (the) – Bank Country MH

\* This list will be updated each time the European Union updates and publishes the list of countries considered tax havens.



## Vendor request

### Authorization

Mail to the compliance department ([pr.aparicio@minor-hotels.com](mailto:pr.aparicio@minor-hotels.com)) requesting authorization for the creation of the supplier. (Only the person in charge of the area or GM can request these approvals) attaching formalized contract with vendor in this mail. If there is no contract, explain the reason and justify the operation and origin of the transaction

### Vendor request in SAP \*\*

It is mandatory to attach the compliance approval mail when requesting the creation of the provider, otherwise any request that involves creating an account in countries of EU black list will be rejected.

\*\* In the extension request of existing suppliers in the master, with bank accounts in countries of EU black list, it will not be necessary to include any type of approval by Compliance.

### Vendor modification

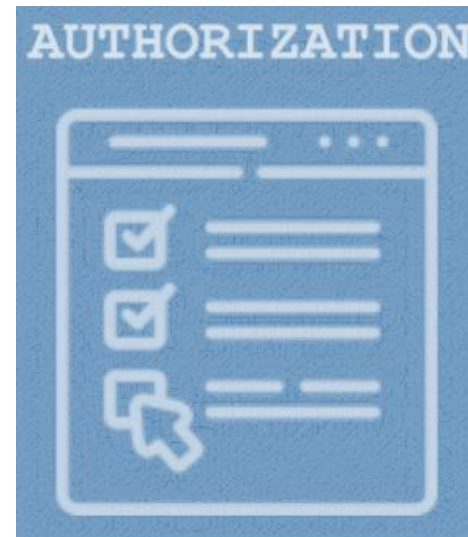
In case of requesting to include a bank account in countries of EU black list in an existing supplier in the SAP data master, this request must also include the approval by the Compliance Area



## Purchase order management

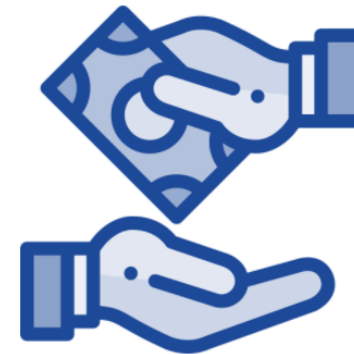
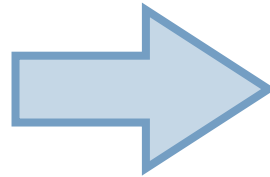
### Authorization

MM / FI – Prior to hiring/creating the PO, the GM or Area Manager in CS / HQ must request by email, the approval from the Compliance Area ([pr.aparicio@minor-hotels.com](mailto:pr.aparicio@minor-hotels.com)) for that purchase / service. This approval must be kept since it will be mandatory to include it in the payment request (it must be included in the payment request JIRA that will be opened when necessary. If such approval is not included, the payment will be automatically rejected. See next slide.



## Payment process

- Payments will be made only by express request of users through JIRA (Category: Accounts Payable / Sub-category: Payments)
- The HQ/CS Responsible Area or Hotel GM must attach in the JIRA the email with the approval requested prior to the creation of the purchase order or contracting the service (see previous slide. If such approval is not included, the payment will be automatically rejected.
- Attach the formalized contract with that supplier, if any, and the concept of the purchase, amount, and, if applicable, justification of the services provided.
- Once the payment is approved, the AP department will manage the payment of the invoice."



# THANKS!

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