

# POLICY FOR SHARING TRAINING AND SEMINAR INFORMATION WITH MEMBERS THE ASSOCIATION OF COMPLIANCE OFFICERS OF CURAÇAO

## Introduction

The Association of Compliance Officers Curacao ("ACCUR") is a non-profit organization dedicated to promoting compliance best practices and fostering education within the compliance community on Curacao. Our primary goal is to support our members with resources and knowledge to enhance their professional capabilities.

To maintain the integrity and focus of our mission, we adhere to a policy regarding the dissemination of training, seminar, and event information requested by a members or external parties. We only share information that is purely educational in nature. We explicitly avoid supporting or enabling materials that function as disguised sales pitches.

This policy outlines the conditions under which we will share such information with our members and the responsibilities of those requesting our assistance.

#### Acceptable requests

ACCUR will consider disseminating information about trainings, seminars, or events under the following conditions:

- 1. **Educational purpose**: The primary and demonstrable focus of the material must be on providing educational content relevant to the compliance field. Examples include courses on regulatory updates, workshops on compliance processes, or seminars on emerging trends in anti-money laundering practices.
- 2. **Non-commercial nature**: The material must not contain overt or covert sales elements, such as promotional content for products, services, or brands.
- 3. **Alignment with compliance goals**: The content must align with the objectives and values of the Association, promoting compliance awareness and professionalism.

#### **Prohibited requests**

ACCUR will not share information that:

- 1. **Contains sales promotions**: Includes any form of direct or indirect advertising, endorsements, or marketing pitches for products or services.
- Lacks transparency: Misrepresents the nature of the event or fails to disclose potential conflicts of interest.
- 3. **Fails to respect member privacy**: ACCUR will not share member contact information or forward materials that breach data protection principles.

#### **Confirmation of compliance**

Members or external parties requesting ACCUR to distribute information must confirm in writing that their material adheres to this policy. A written confirmation should accompany the request, confirming that:

- The material is educational and non-commercial.
- It aligns with the compliance-focused mission of ACCUR.
- No promotional content is included, either directly or indirectly.

### Post-distribution accountability

If it is later determined that the material shared through ACCUR violates this policy, the following actions will be taken:

- 1. ACCUR reserves the right to retract the distribution of the material and issue a clarification to its members.
- 2. The offending party will receive a formal warning regarding the breach of policy.
- 3. Repeated violations may result in suspension or termination of membership or participation in ACCUR activities.

By adhering to this policy, we ensure that ACCUR remains a trusted and unbiased resource for compliance professionals on Curacao.

#### **BOARD OF ACCUR**