

# FINANCIAL CRIME POLICY

Financial crime is the collective term for offences involving money. This includes fraud, theft, bribery, tax evasion, and money laundering.

As a responsible business we have an important role in society to deter, detect and report financial crime. This policy explains how we protect our business, our people, our clients and their customers from being victims of financial crime and what you should expect from us.

We are committed to operating in accordance with all applicable laws and regulations, taking all proportionate steps to deter, detect, report and investigate any form of financial crime, including:

- Fraud against us or our clients
- The use of any of our businesses to launder the proceeds of crime, to finance terrorism or to facilitate tax evasion
- The use of 'inside information' for personal or business gain or the illegal manipulation of any of the financial markets we may operate in
- The undertaking of active or passive bribery or failures to prevent such activity of any associated parties in jurisdictions we operate.

We are further committed to operating in accordance with all applicable sanction restrictions imposed by the United Kingdom HM Treasury, the European Union, the United Nations or other authorities.

This will be in line with our code of conduct and Optua's standards, which set out baseline requirements that must be followed by our businesses and any person who works for us in the areas of:

- Anti-money laundering and countering terrorist financing
- Fraud
- Sanctions
- Prevention of facilitation of tax evasion
- Anti-bribery and corruption
- Disclosure and control of inside information

You should expect from us that we operate our business in a way which deters, detects, investigates and reports financial crime, including undertaking checks of our business relationships and those who work with us, making sure our inside information about our company is protected and managed in a way to make sure it is controlled and limited to those who need to know it, investigating and acting against any individual or group perpetrating financial crime against us, our people, or our clients, reporting any known instances to the police.

Furthermore, we should expect that we work collaboratively with law enforcement and other appropriate authorities in support of investigations and pursuance of prosecutions.

We reserve the right to search all company property and to review all data stored on our systems if there are any reasonable suspicions of financial crime activity.

We expect that our people, our clients and those who work for us to demonstrate the commitments of this policy and the requirements of the standards and procedures which support it, completing all financial

crime documentation or training that applies to you, to immediately report any suspicion of financial crime being committed through the procedures established in the requirements of standards which support this policy, or local suspicious activity reporting procedures where these are in play.

You must not inform or 'tip-off' anyone if:

- You have a suspicion that they may be committing a financial crime
- Suspicious transactions or activity has been reported
- You are aware a law enforcement investigation is intended or underway.

We expect that our managers ensure this policy is prompted and applied in the divisional or functional area you are responsible for.