

# Financial Crime Policy

## Version 1.0

## AdvT Group Policy

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## 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 our clients and our business.
  - 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 the financial markets we operate in.
  - The undertaking of active or passive bribery or failures to prevent such activity of any associated parties in jurisdictions we operate.
- Operating in accordance with all applicable sanction restrictions imposed by the UK HM Treasury, the European Union, the United Nations or other authorities.

### In line with

- Our policies.
- A professional law and ethical standard of conduct, 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 Anti-Corruption – Further guidance available in the Anti-Bribery and Anti-Corruption policy.
  - Disclosure & control of inside information - Further guidance is available in the MAR Compliance manual.
  - Share dealing rules – Further guidance is available in the Share Dealing Code.

### What you should expect from us

- Operating our business in a way which deters, detects, investigates and reports financial crime. This includes:
  - Undertaking checks of our business relationships and those who work with us.
  - Making sure 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.
  - Working 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 reasonable suspicions of financial crime activity.

### What we expect from you

- Demonstrate the commitments of this policy and the requirements of the standards and procedures which support it.
- Complete all financial crime 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 place.
- To 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
- To not deal in any the AdvT group securities (for example, AdvT group shares) at any time if you have unpublished insider information or price sensitive information in relation to the AdvT group activities. Further guidance is available in the MAR Compliance manual.
- To speak up if you face a situation where:
  - you are not sure what to do or have a concern in relation to this policy.
- Our Speak Up Policy sets out the channels available to you and no action will be taken against you if you report a genuine concern. Whether any concerns are proven or not.

### What we expect from our managers

- To ensure this policy is promoted and applied in the functional area you are responsible for.

### How we achieve this

- Every function in the AdvT Group must adhere to this policy and associated standards, procedures and guidance as relevant to their activities.
- Our management teams are supported by the board of the AdvT Group who provide counsel and challenge to support decision making and the investigation of concerns raised in relation to this policy.
- We take policy non-compliance very seriously. Exceptions are reported and managed through our governance mechanisms, which ultimately includes our Risk and Audit Committee.