



25 January 2024

M&G plc (“M&G”) Anti-Financial Crime Statement

This statement, alongside the M&G plc Wolfsberg Questionnaire and AML Comfort Letter, encompasses all subsidiaries globally of M&G plc.

The wider M&G Risk Management Framework ensures M&G complies with the relevant legal and regulatory requirements (e.g. Proceeds of Crime Act 2002, Sanctions and Anti-Money Laundering Act, UK Money Laundering Regulations 2017, as amended by The Money Laundering and Terrorist Financing (Amendment) Regulations 2019, The Money Laundering and Terrorist Financing (Amendment) (EU Exit) Regulations 2020 and the Criminal Finances Act 2017) as well as industry guidance (e.g. JMLSG Guidance, FCA Financial Crime Guide, etc). These, where relevant, apply to M&G entities in the jurisdictions within which it operates.

The Financial Crime Compliance Policy allows firms to effectively manage the financial crime risks that M&G, its employees, products and services, and wider society are exposed to on a daily basis. How the necessary anti-financial crime controls are arranged, maintained and monitored is determined by procedures, processes and the oversight framework that are derived from the Financial Crime Compliance Policy.

The Financial Crime Compliance Policy includes the following:

- Appointment of MLRO(s)/AML Officer(s) and/or a Nominated Officer(s), where local regulation requires
- Conducting regular risk assessments to manage financial crime risks
- Monitoring the horizon for regulatory change to ensure financial crime controls are up to date
- Submission of annual financial crime reports to relevant boards and committees
- Production of financial crime based regulatory reports, including the MLRO Report, to maintain an open and transparent relationship with regulators
- Annual attestation to the policy by all M&G Executive Committee Members
- Ensuring appropriate key risk indicators against risk appetite
- Maintenance of records as required by local law
- Ensuring equivalent financial crime controls for third parties conducting activities on our behalf
- Ensuring contractual agreements contain appropriate financial crime clauses
- Regular financial crime training to employees, and additional training for colleagues identified in higher-risk roles
- Application of proportionate Customer Due Diligence (‘CDD’) to mitigate the risk of financial crime in line with UK Money Laundering Regulations and JMLSG, including:
 - Identifying the customer and verifying their identity
 - Taking a risk-based approach by considering factors such as product or service, geography, delivery channels and transactions
 - Conducting regular screening in order to identify Politically Exposed Persons (‘PEPs’), Relative or Close Associates (‘RCAs’) or sanctioned parties
 - Identification and scrutiny of suspicious or unusually complex transactions through ongoing monitoring
 - Conducting CDD checks through the course of the business relationship
 - Carrying out enhanced due diligence where higher risks are identified



- Compliance with applicable financial sanctions regimes, which include as a minimum, but not limited to those administered by:
 - the Security Council of the United Nations (UN);
 - the United Kingdom's Office of Financial Sanctions Implementation (OFSI);
 - the United States Department of the Treasury's Office of Foreign Assets Control (OFAC);
 - the Council of the European Union (EU); and
 - any other sanction authorities in jurisdictions where M&G operates or is licensed.
- No entity within M&G is located, organised or resident in a country subject to an extensive sanctions programme, e.g. Afghanistan, Belarus, Cuba, Iran, North Korea, Russia, Sudan, Syria, Ukraine (Crimea Region, Sevastopol, Luhansk region and Donetsk region) or Venezuela
- Screening of employees, transactions, potential and existing business relationships against appropriate sanctions regimes
- Daily, weekly and monthly batch screening is undertaken as part of regular screening
- M&G does not conduct business with sanctioned targets and any sanctioned assets would be identified and frozen in accordance with applicable sanctions regulations
- Ensuring anti-bribery measures are in place to prevent bribery and corruption
- Compliance with the relevant legal requirements (e.g. UK Bribery Act 2010, Criminal Finances Act 2017, US Foreign Corrupt Practices Act 1977) and guidance (e.g. UK Ministry of Justice Guidance, FCA Financial Crime Guide) related to bribery, corruption that apply in the countries in which M&G operates

A handwritten signature in black ink that reads 'DJPowers'.

David Powers
Group MLRO, M&G plc