



25 January 2024

Addendum to M&G plc Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

This document accompanies the M&G plc Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2), signed by the Group MLRO on 25 January 2024.

The information within this document is intended to give clarity to the responses provided in the Wolfsberg Questionnaire and encompasses all M&G plc ("M&G") subsidiaries.

Question Number	Question	Answer	Rationale
11 d	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding Cash Reporting	Not Applicable	M&G does not deal in physical cash
17 e	Does the Entity provide mandatory ABC training to third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	Outsourced compliance activities do not include management of ABC risks on behalf of M&G
19 f	Does the Entity have policies and procedures that prohibit opening and keeping of accounts for Section 311 designated entities	No	M&G is a UK headquartered company and is not a US person therefore Section 311 companies designated under the US Patriot Act are not applicable to us. This only applies to domestic US institutions
29 a1	Is KYC renewed at: Less than one year	Yes	This is by exception and on a risk based approach
29 a4	Is KYC renewed at: 3 – 4 years	No	Periodic reviews are conducted in line with risk classification
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards	No	M&G is not a payment services company therefore the related Wolfsberg Group Transparency Standards are not applicable
44 e	Is mandatory training provided to third parties to which specific FCC activities have been outsourced	No	Mandatory training is in-house and available only to M&G employees or associated persons. M&G seeks assurances that financial crime training is a mandatory requirement across service providers and provides ad-hoc training, where necessary.

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