

Estate Insurance Group

Statement of Anti-Money Laundering (AML)

Financing (CTF) Policies and Principles

Money laundering and terrorist financing have been identified as possible threat to Estate Insurance Group.

The United Kingdom, in common with many other countries, has passed legislation designed to prevent money laundering and to combat terrorism. This legislation, together with regulations, rules and industry guidance, forms the cornerstone of AML/CTF obligations for UK firms and outline the offences and penalties for failing to comply.

The requirements of EU/UK legislation apply to Estate Insurance Group.

Estate Insurance Group is authorised and regulated by the UK Financial Conduct Authority (FCA).

Estate Insurance Group will by various means establish the identity of its customers.

Your Customer (KYC), AML and HMT.

Legal and Regulatory Framework:

The principal requirements, obligations and penalties, on which Estate Insurance Group operates are as follows:

Key legislation:

- The Proceeds of Crime Act 2002 (POCA), as amended by the:
 - i. Serious Organised Crime and Police Act 2005 (SOCPA); and the
 - ii. Proceeds of Crime Act (Amendment) Regulations 2007;
- The Terrorism Act 2000, as amended by the:
 - i. The Anti Terrorism, Crime & Security Act 2001; and the
 - ii. Terrorism Act (Amendment) Regulations 2007;
- The Terrorism Act 2006;
- The Bribery Act 2010;
- The Money Laundering Regulations 2007, transposing the requirements of the EU's Third Money Laundering Directive;

- The FCA Handbook of Rules and Guidance, and in particular, the Senior Management Arrangements, Systems and Controls (SYSC) Sourcebook, which relates to the management and control of money laundering risk.

These policies and principles are designed to ensure that Estate Insurance Group complies with the legal and regulatory requirements applicable in the UK as well as with their local obligations.



Anti-Money Laundering (AML) Policy:

The Estate Insurance Group AML Policy is designed to ensure that the Company complies with the requirements and obligations set out in UK legislation, regulations, rules and Industry Guidance for the financial services sector, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime. The AML Policy sets out the minimum standards which must be complied with by Estate Insurance Group.

- The appointment of a Money Laundering Reporting Officer (MLRO) Jeremy Stephen – Managing Director. Of sufficient seniority, who has responsibility for oversight of compliance with relevant legislation, regulations, rules and industry guidance;
- Establishing and maintaining a Risk Based Approach towards assessing and managing the money laundering and terrorist financing risks to the Company;
- Establishing and maintaining risk-based customer due diligence, identification, verification and know your customer (KYC) procedures, including enhanced due diligence for those customers presenting higher risk, such as Politically Exposed Persons (PEPs).
- Establishing and maintaining risk based systems and procedures to monitor ongoing customer activity;
- Procedures for reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate;
- The maintenance of appropriate records for the minimum prescribed periods;
- Training and awareness for all relevant employees; and
- The provision of appropriate management information and reporting to senior management of the Company's compliance with the requirements;

2. Sanctions Policy:

The Estate Insurance Group Sanctions Policy is designed to ensure that the Company complies with applicable sanctions laws in the jurisdiction in which we operate.

Estate Insurance Group is required to screen against United Nations, European Union, UK Treasury and US Office of Foreign Assets Control (OFAC) sanctions lists at a minimum in all jurisdictions in which we operate, unless to do so would conflict with local legislation.

Failure to comply with the policy may give rise to disciplinary action, up to and including dismissal.

4. Introducer Policy

In addition to the Anti-Bribery and Anti-Corruption Policy, Estate Insurance Group has an Introducer Policy. The Policy covers the activities of all third parties that generate or retain business, or secure a business benefit, for Estate Insurance Group. These third parties are termed "introducers" by Estate

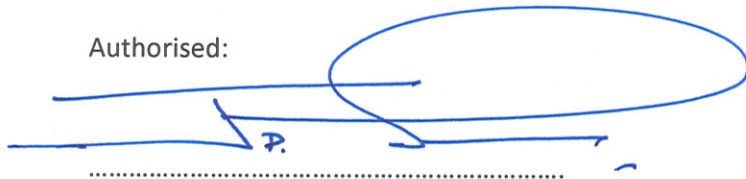
Insurance Group. Potential examples would include senior advisors, lead generators and financial advisers. The Estate Insurance Group Introducer Policy is designed to protect Estate Insurance Group against the bribery and corruption risks, reputational risk, and wider operational and conduct risks associated with introducers. Estate Insurance Group employees must apply the specific controls and procedures set out in the policy.

Company Governance & Conformance:

Regular reviews of the effectiveness of these Company Policies are carried out in addition to audits periodically undertaken by the Estate Insurance Group Internal Audit function. This provides senior executive management oversight committees and the Board Audit Committee with the necessary assurance.

In addition, the Company's external consultant will perform periodic audits against BS13500 2013 – Corporate Governance. Feedback will be presented to the Board.

Authorised:



Jeremy Stephen

Managing Director

February 2017