

# Estate Insurance Group

## Financial Crime Statement

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## 1. Introduction

We maintain the highest standards of business ethics, honesty, openness and accountability.

We promote integrity and honesty and will not tolerate any:

- Fraud
- Dishonesty
- Deception
- False accounting
- Concealment
- Money laundering
- Terrorist financing
- Corruption
- Bribery, including the giving, promising, offering, requesting, agreeing to receive or acceptance of bribes
- Market abuse
- Any other illegal behaviour

This applies if the perpetrators are internal or external for example customers, agents, consultants, executives, staff, contractors, shareholders or others.

This statement outlines our response to financial crime and provides you with contact details, for where you have any concerns around any of the above in connection with us.

### 1.1 Objective

We aim to:

- Minimise the potential and actual incidence of financial crime
- Detect financial crime
- Minimise the risk of subsequent losses
- Improve the chance and scale of recoveries
- Make it clear we will not tolerate financial crime
- Promote honesty
- Reduce the opportunities for financial crime in co-operation with other organisations.

Internal policies and procedures detail controls to minimise financial crime.

## 2. Policy

### 2.1 Customer Due Diligence

To protect you and us from financial crime, we will:

- Verify the identity of our customers
- Verify the identity of beneficial owners, where necessary
- Verify the identity of any additional parties (e.g. third parties, attorneys, relevant parties to a trust).

Where verification of identity is required and cannot be completed, we may not be able to proceed with the relationship/transaction. We will consider alternative forms of verification, if somebody has a legitimate social reason for not being able to provide the standard form of evidence of identity.

### 2.2 Politically Exposed Persons Monitoring

To protect you and us from financial crime, we will identify politically exposed persons (PEPs) during the establishment period of a business relationship. We recognise that only very few PEPs are corrupt, however we will implement additional controls, if we think the risk is higher.

### 2.3 Sanctions

Sanctions/restrictions on activity with targeted individuals, countries, governments, and entities, are sometimes imposed by the United Nations (UN), or by individual countries, such as the UK or by groups of countries such as the EU.

We comply with applicable sanctions.

If an existing client becomes a sanctioned party, we will report this to the appropriate authorities, and freeze all relevant accounts until further instruction.

### 2.4 Suspected or Actual Financial Crime

Staff report any knowledge or suspicion of financial crime to the nominated officer, whose team investigated. Where appropriate, the concerns will be reported to the relevant law enforcement and/or regulatory authorities.

We comply with court orders received from law enforcement agencies.

We also support law enforcement agencies to detect and confiscate criminal proceeds.

### 2.5 Training

All staff receives relevant anti-financial crime training.

## 2.6 Record Keeping

All relevant records are retained to satisfy legal requirements.

### **3. Reporting Financial Crime**

If you have any financial crime concerns in connection to us, please contact out:

#### **Whistleblowing Hotline – 0800 0725281**

The whistleblowing hotline is a free phone number for your whistleblowing referrals in relation to us and is open 24 hours a day.