

AML policy.

November 2023 V2.0

INSPIRED THINKING GROUP

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ITG is a responsible and ethical business that has a zero tolerance to crime and corruption, this includes the practice of money laundering with any revenues or profits generated or held within the business or by its employees.

This policy refers to Anti-Money Laundering (AML) practices ITG employs. Money laundering is the process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. The definition also

includes money that may be used to fund terrorist activities.

There can be severe consequences for companies and individuals found guilty of money laundering offences, including criminal sanctions.



Who does this policy apply to?

This policy applies to all ITG “employees”, which means all employees, including subsidiaries (whether temporary, fixed term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents and sponsors. This policy should also apply to officers, trustees, board members or committee members at any level.

Breaches of AML laws and regulations can lead to criminal penalties against companies and individuals.

Penalties can range from disqualification of directors and fines to imprisonment of individuals. Companies found guilty of AML breaches may have their licence(s) revoked, face the disruption and cost of significant remediation and other restrictions on their business.

ITG is committed to complying with all applicable laws and regulations. Any employee found to have breached this policy may be subject to disciplinary action, up to and including dismissal, and may be subject to criminal sanctions.

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What is Money Laundering?

Money laundering is defined as the process of concealing the origins of illegally obtained money so that they appear to come from legitimate sources. The definition also includes money that may be used to fund terrorist activities.

Anyone who is aware of or suspects any money laundering activities and who does not report their concerns can be in breach of the law.

The following examples of activities may be defined as money laundering and are strictly prohibited under this policy:

- Conducting any transactions (including acquisitions and disposals) which include any property that is known or suspected to have come from criminal or unlawful activities, regardless of the country or region where the activities occurred (“Criminal Property”)
- Conversion or transfer of Criminal Property

Red Flags, what to watch out for...

Where suspicious activity arises involving a business relationship (e.g., customer, supplier, other third party) employees must consider whether there is a risk of money laundering or terrorist financing.

The following list provides some examples of red flags that could indicate such activities:

- requests by a customer to pay in cash
- payments from countries that are considered higher risk (see either global Financial Action Task Force list www.FATF-GAFI.org or local regulator/government list for high risk locations) for money laundering or terrorist financing, tax havens, or unrelated or unusual to the customer
- structuring of transactions that appear to avoid government reporting or record-keeping requirements.

with the aim to conceal or disguise the illicit origins

- assisting any person who is involved in commissioning transactions involving Criminal Property to evade legal consequences
- any activities undertaken to conceal the true origin, location, movement, nature, or ownership/control rights of Criminal Property

The definition of money laundering covers a wide range of activities, and anyone could be in breach of the law if they suspect any existence of Criminal Property within their company and continues to be involved in activities without reporting their concerns. Terrorist financing may not necessarily involve any proceeds of crime but may conceal the intended use of the funds, which will later be used for criminal purposes.

- unexpected changes in a customer’s activities
- overpayments of invoices, with requests for refunds
- refunds requested to a different party or account number
- third parties that are reluctant to provide sufficient and complete information when required to do so, making it difficult to perform due diligence activities
- customers where the true beneficial owner cannot be determined, or that have unusually complicated business structures, or payment patterns that reflect no real business purpose
- adverse media on the integrity and conduct of the business and directors/owners

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How to raise a concern

Employees are encouraged to raise concerns about any issue or suspicion of misconduct at the earliest possible stage. If they are unsure whether a particular act constitutes money laundering, or if they have any other queries or concerns, these should be raised with their line manager initially or through the People team or the group Whistle blowing officer on ESG@teamITG.com

More information on speaking up and whistleblowing

The policy and updating

ITG will train all its employees annually in anti-money laundering and support any employee that speaks up and reports any suspicious activity in line with this policy.

This policy forms part of the group ESG framework and will be updated annually in line with the business requirements. If you have any considerations or

can be found in the [ITG Group Speak Up Policy](#).

To ensure that any investigation is not compromised, employees should not attempt to investigate concerns themselves to avoid alerting the individual(s) concerned. This includes not discussing the incident with colleagues before it has been investigated and confirmed

concerns with the policy, please contact the ITG Group Commercial Operations and Risk Director who will investigate and address any comments.

This policy is also aligned with the ITG business risk register and updated to ensure ITG is a ethical and sustainable business that considers all elements of crime and corruption in all its services.

Policy review and approval

This policy will be reviewed annually or with any major change in legislation or practice. It is approved and monitored at a board level and reported on through internal and external audits, where applicable.

Any questions or queries should be send to:

ESG@teमितg.com

Effective date	Version	Owner	Changes
November 2022	V1.0	Chris Egerton	New ESG Framework
November 2023	V2.0	Chris Egerton	Annual Update