



# Anti-Money Laundering

## Our commitments

Version 1.0, 28 March 2018



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# Anti-Money Laundering

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## 1.1 Introduction

### 1.1.1. Statement on Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) Policy)

TP ICAP is committed to:

- Not being used by criminals to launder the proceeds of crime or by terrorists or sanctioned individuals and entities;
- Protecting the integrity and stability of financial markets and national economies;
- Complying with applicable legislation and regulations that work towards maintaining the integrity and stability of financial markets and national economies;
- Helping combat terrorist financing;
- Complying with economic and trade sanctions issued by relevant governments and organisations in every jurisdiction in which we operate and
- Operating in line with the Wolfsberg Group's Guidance on a Risk Based Approach for Money Laundering Risks.

To this end, the Group has implemented an AML control framework.

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## 1.2 Legal and regulatory framework

### 1.2.1. TP ICAP ensures it meets its legal and regulatory requirements, which are primarily contained within:

- The Proceeds of Crime Act 2017, as amended by the Serious Organised Crime and Police Act 2005; and the Proceeds of Crime Act (Amendment) Regulations 2007;
- The Terrorism Act 2000 (modified by Counter Terrorism Act 2008);
- The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017;
- The FCA Handbook (SYSC); and
- The Criminal Finances Act 2017.

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## 1.3 Tax evasion

### 1.3.1. Tax Evasion is a crime and a predicate offence to money laundering in the UK and in many other countries in which TP ICAP operates. The Group is committed to ensuring that neither it, nor any other person providing services 'for or on behalf of' it, facilitates tax evasion and has implemented systems and controls accordingly.

#### **1.4 AML/CTF and Sanctions programme**

1.4.1. As an inter-dealer broker, the Group plays an important role as a liquidity provider in global wholesale markets. The Group has adopted a risk-based approach to assessing the threat of being used in connection with money laundering and/or terrorist financing.

As a minimum, the following controls are required under Policy:

- AML Risk Assessment;
- Screening of all clients to identify PEPs, Sanctions and other AML/CTF risks;
- AML, CTF and Sanctions training;
- Country Risk Rating Assessment to identify high risk jurisdictions and their impact on the client due diligence process;
- Financial Crime Management Information presented to regional and group management committees;
- All clients are subjected to AML/KYC client due diligence prior to trading and on an ongoing basis thereafter:
- On-going transaction monitoring of trading activity to highlight unusual or suspicious activity, and
- Timely reporting to the relevant authorities regarding internal or external suspicious activity, in accordance with jurisdictional requirements.

In addition, TP ICAP mandates that all reports of suspicions of financial crime must be reported to the relevant authority within prescribed timescales. Any such, reports may be made within the framework of the TP ICAP Group Whistleblowing Policy.

Information regarding suspicion reports must only be given to the appropriate manager and must not be disclosed to the person about whom the suspicion has been raised or any other inappropriate person.

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#### **1.5 Governance**

1.5.1 TP ICAP's Group AML/CTF Policy is approved by the Group's Board of Directors and applies to all TP ICAP's businesses globally. TP ICAP's internal audit function carries out regular AML audits which provide Senior Management with the necessary assurance regarding the operating effectiveness of the AML Policy and the related systems and controls.