



Anti-Money Laundering, Counter Terrorist Financing and Sanctions Policy Statement

**Version 2.0
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1 Introduction

Statement on Anti-Money Laundering (AML), Counter Terrorist Financing (CTF) and Sanctions.

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;
- Preventing the facilitation of tax evasion;
- Fully adhering to international sanctions programs as issued by relevant authorities.

2 AML/CTF Control Framework

The Group assesses the threat of being used in connection with money laundering, terrorist financing and/or the facilitation of relevant predicate offences.

To maintain an effective AML/CTF framework, the Group has established and maintains risk-based policies and procedures which:

- a) Recognise the money laundering/terrorist financing/facilitation of tax evasion threat to the Group varies across clients, jurisdictions, products and delivery channels;
- b) Allow management to differentiate between their clients in a way that matches the risk in their business; and
- c) Allow senior management to tailor the Group's procedures, systems and controls, and arrangements in particular circumstances.

3 Sanctions Control Framework

The Group complies with the sanctions programs of the jurisdictions in which it operates.

TP ICAP has determined that the sanction programs of the US, UK, EU and UN apply globally to TP ICAP entities.

4 AML/CTF and Sanctions programme

TP ICAP applies the following controls to manage the risk of AML, CTF and Sanctions:

- AML and Sanctions Risk Assessment;
- Locally documented policies and procedures to implement the Global Policy, as well as local regulatory requirements;
- Client, Vendor and Employee screening to identify financial crime red flags and when identified, mitigating those risks;
- All clients are subjected to AML/KYC client due diligence prior to the provision of services and on an on-going basis thereafter;
- AML, CTF and Sanctions training;
- Financial Crime Management Information presented to relevant Governance Forums;
- Monitoring of business relationships, including client transactions for potentially suspicious activity, and
- Where required, filing a Suspicious Activity Report with the relevant law enforcement authority.

5 Governance

TP ICAP's Group AML/CTF and Sanctions Policy is approved by the relevant Governance Forum and applies to all TP ICAP's businesses globally.

TP ICAP's internal audit function carries out regular Anti-Financial Crime (AFC) audits which provide Senior Management with the necessary assurance regarding the operational effectiveness of the AFC Policies and the related systems and controls.