

## Financial Crime Statement

LMIS is committed to maintaining an open culture which ensures transparency and accountability, and allows us to comply with all applicable laws and regulations designed to combat financial crime. LMIS has a robust set of systems and controls which have been created to ensure that we manage the risk of financial crime appropriately.

The policy covers the following areas:

- Bribery and corruption.
- Sanctions.
- Terrorist financing.
- Money laundering.
- Facilitation of tax evasion; and
- Fraud.

### **Anti-Bribery and Corruption Policy**

This Policy sets out LMIS's zero-tolerance approach to bribery and corruption, including so-called facilitation payments, and describes the implications for broker remuneration, gifts and entertainment, and recruitment. It also includes definitions and examples of both bribery and corruption in order to facilitate understanding.

### **Sanctions**

This policy sets out the different types of sanctions that could apply to LMIS or its clients, the customer due diligence steps that need to be taken (including enhanced steps for higher-risk jurisdictions), the approach to claims payments, underwriting steps to be taken to ensure sanctions compliance, and controls which need to be exercised over delegated authority underwriting and claims handling.

### **Anti-Money Laundering, including Terrorist Financing and Tax Evasion**

This policy highlights the main risks to the business from these types of suspicious activities, and how they can be linked to each other. It also sets out the principal obligations on our people to deal with these risks, and steps to be taken for the reporting of suspicious transactions.

### **Fraud Policy**

This Policy describes the different types of fraud (both internal and external) to which LMIS is exposed and steps business areas should take in order to protect both the company's and its customers' assets.