

## FINANCIAL CRIME POLICY STATEMENT

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#### *Important information*

*This document has been issued by Braddons Limited which is authorised and regulated by the Financial Conduct Authority. Registered Office No 3 Beer Cart Lane, Canterbury Kent, CT1 2NY Registered in England No 2877960*

## 1. INTRODUCTION

The Board of Braddons Limited recognise that that financial crime in all its forms is a threat to the Company and has implemented systems and controls to identify, assess, monitor and manage the Financial Crime Risk associated with the business. Braddons Limited is committed to the prevention of financial crime such as money laundering and bribery and corruption and has put into operation systems and controls proportionate to the nature, scale and complexity of the business. These systems and controls are reviewed annually to meet the needs of the Company's business model. New products, customer profiles, distribution channels or emerging risks within external environments are monitored. The Financial Crime Officer has the responsibility of updating and circulating the Financial Crime Policy following any review and to provide other senior management with sufficient information to understand any financial crime risk to which the company is exposed. The FCO also has responsibility for distributing to relevant staff information about emerging financial crime risk and any legal and regulatory developments.

Braddons Limited has compiled a Financial Crime Risk Assessment which includes the identification, quantification and documentation of the financial crime risks that the business faces. This FCRA has taken into consideration any type of financial crime that the business may be exposed to including but not limited to Fraud, Bribery and Corruption Terrorist financing, Money Laundering, Market abuse. In the compilation of the FCRA attention is focused on the jurisdiction within which the Company operates, the types of products and services provided, the type of Client and the distribution channels we use to service our Clients in addition to the complexity and number of transactions carried out.

## 2. OUR OBJECTIVES

Through our Financial Crime policies and procedures we aim to prevent, deter, detect and investigate if required all forms of financial crime

## 3. ANTI MONEY-LAUNDERNG

Braddons anti-money laundering (AML) is designed to ensure full compliance with UK legislation, regulations, rules and industry guidance for the Financial Services industry. The FCO is responsible for Client due diligence and on accepting a new client an AML review is undertaken by a Director of the Company. This review considers any potential Financial Crime Risk that the company may be exposed to if the relationship were established or maintained. It is understood that where verification of identity is required and cannot be fulfilled we may not be able to establish a client relationship. All staff received relevant AML training and all staff are required to report any knowledge or suspicion of a financial crime to the FCO.

## 4. ANTI-BRIBERY AND ANTI-CORRUPTION

Corruption, bribery and unfair or anti-competitive practices are not tolerated and Braddons takes pride in its approach to business relationships. Integrity and honesty is at the heart of how we do business and we expect this from our staff and all those that we do business with.

## 5. ANTI-FRAUD

Braddons is committed to preventing fraud from occurring and to developing an anti-fraud culture. Systems and controls are in place to ensure robust preventative measures are in force. Should a fraud occur a prompt investigation will take place and appropriate disciplinary or legal action where required will be instigated. Records and reports of any fraud will be retained.

*Approved by the Board*