



**Last Update: March 2025**

Annington Limited  
Hays Lane House  
1 Hays Lane  
SE1 2HB

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## 1. INTRODUCTION

This Policy sets out the policies of Annington Limited and its Group of subsidiary Companies (“Annington”, the “Company”, “we”, “us”) in relation to financial crime, including money laundering, terrorist financing, facilitation of tax evasion, bribery and corruption.

Annington is not a regulated entity for the purposes of the United Kingdom (UK) Anti-Money Laundering (AML) regime.

In the event of any conflict or inconsistency between this Policy and any other document, the provisions of this Policy will prevail.

This Policy describes the steps Annington expects Employees to take to mitigate the risk of Annington becoming or being involved in transactions that have a connection with money laundering, bribery, corruption, fraud and/or tax evasion. This Policy also aims to assist Employees with identifying such situations and taking appropriate action.

### **Board and Senior Management Commitment**

Financial crime is a serious threat to society, leading to lost revenue and endangering life, as well as fuelling other criminal activity. Annington is committed to complying with its obligations under relevant financial crime legislation and has no tolerance for any part of its business being used for the purposes of financial crime.

Annington runs its business with integrity and in an honest and ethical manner. All of us must work together to ensure it remains untainted by any connection with money laundering, bribery and corruption or the facilitation of tax evasion. This Financial Crime Policy is a crucial element of that effort. It has the full support of the Board of Directors of Annington (“**Board**”).

### **Who is covered by this Policy?**

The purpose of this Policy is to make clear the standards expected of everyone who performs services for or on behalf of Annington, which may include Employees, Directors and Third Parties. This Policy gives an overview of the key financial crime offences which are relevant to Annington’s business, the potential consequences of failing to adhere to the standards expected under UK financial crime legislation, how to recognise and report possible financial crime, and what to do after reporting possible financial crime.

### **Who must comply with this Policy?**

This Policy is mandatory and applies to everyone who provides services for or on behalf of Annington. Failure to comply with this Policy could:

- lead to Annington (and/or individuals associated with it) committing criminal offences or facilitating financial crime committed by others, which could lead to significant penalties being imposed on the individual(s) and/or Annington; and
- additionally, expose Annington to other serious negative consequences including investigations and/or litigation, fines, other substantial financial penalties, loss of reputation and limitations on its ability to do business in particular countries and/or with particular types of counterparties.

This Policy does not form part of any Employee’s contract of employment. However, employees who fail to comply with this Policy may be subject to disciplinary action, up to and including dismissal. Any non-Employee who breaches this Policy may have their contract terminated with immediate effect. Annington may amend this Policy at any time.

Employees should refer any questions about this policy to the Financial Crime Officer. This Policy is based on UK financial crime legislation, but it is applicable to the conduct of all Employees of Annington and anyone who provides services for or on behalf of Annington, wherever in the world they are located.

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All Employees are expected to:

- **Be aware of and follow this Policy and complete relevant financial crime training.** Employees will be asked to sign declarations confirming that they have read and understood this Policy, and that they have completed mandatory Company training on financial crime topics at least every two years.
- **Be alert for anything unusual or suspicious.** Examples of unusual or suspicious activity which could indicate financial crime are set out in this Policy; and
- **Report your concerns to the Financial Crime Officer.** Relevant reporting procedures are described in detail in the relevant sections of this Policy. Please refer to our Company Whistleblowing Policy for relevant protections relating to reporting concerns.

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## 2. DEFINITIONS

**AML:** Anti-Money Laundering.

**Bribery Act:** The Bribery Act 2010 (as amended).

**Employee(s):** All persons employed by Annington Limited or any of its Group of subsidiary Companies, including Directors and Officers

**Executive Director:** Within Annington, “Executive Directors” are the Directors within the Annington Group - Ian Rylatt, and Stephen Leung.

**Financial Crime Officer:** Annington’s Financial Crime Officer is Sarah Jury, contact telephone number: 020 7960 7560 / 07468 495 662. In her absence, please contact Bruce Naylor, contact telephone number: 07884 435 518.

**Government Official(s):** Officials falling within the definition set out in section 6 of the Bribery Act which includes officials of any government department or agency; officials of any public international organisation (e.g. the United Nations); political parties and party leaders; candidates for public office; executives and employees of government-owned or government-run companies (such as an employee in a state-controlled company); anyone acting on behalf of any of these officials; an individual holding a legislative, administrative or judicial position.

**Third Party/Parties:** Any representatives performing work or offering services on behalf of, or for the benefit of, Annington, including (but not limited to) agents, brokers, partners, consultants, contractors, and suppliers.

### 3. POLICY

Annington requires all of its Employees, Directors, contractors, and Third Parties that act on its behalf, whether or not they are directly employed by Annington, to read and adhere to this Policy or in the case of Third Parties, at a minimum, to have an equivalent policy which they adhere to. This Policy extends to all Annington operations.

This Policy should be read in conjunction with Annington's:

- 3.1.1 Gifts and Hospitality Policy;
- 3.1.2 Whistleblowing Policy;
- 3.1.3 Conflicts of Interest Policy; and
- 3.1.4 Employee Handbook (for Employees).

Management, including each Executive Director, is responsible for ensuring that all Employees are aware of all Annington policies, and for taking reasonable steps to ensure that the requirements set out therein are being met.

The Financial Crime Officer has overall responsibility for this Policy which will be monitored regularly to make sure it is being adhered to. The Financial Crime Officer will report periodically to the Board on compliance with this Policy.

Financial crime-related risk within Annington will vary by area/location/activity. Annington aims to ensure our financial crime procedures are proportionate to the risks it faces. As such, where applicable Annington will assess risk on a case-by-case basis.

The Financial Crime Officer has overall responsibility for matters concerning money laundering, bribery, corruption and tax evasion. It is the responsibility of the Financial Crime Officer to review this Policy and its implementation at least every two years to ensure it continues to comply with relevant laws.

Third Parties will be provided with a copy of our Policy as part of Annington's onboarding procedures and will be required to confirm that they will comply with its terms, or that they have and will on request provide an equivalent policy, which they adhere to.

If you have any question about this Policy, you should raise this with the Financial Crime Officer immediately.

#### Training

All Employees (which includes casual, temporary and agency employees) are required to undergo training on a regular basis to ensure they are aware of the types of financial crime set out in this Policy; the risks of engaging in financial crime; Annington's Financial Crime Policy; and how they may report suspected financial crime. New joiners will receive training as part of the induction process. Further training will be provided at least every two years or whenever there is a material change in the law or our Policy and procedure.

It is an Executive Director's responsibility to ensure that all Employees in their department are adequately trained to carry out their duties and are aware of their responsibilities for reporting suspicions of potential financial crime. Employees who ignore or refuse to complete the financial crime training may face disciplinary action.

In some circumstances, Third Parties will also be required to undergo, or certify that they have completed, appropriate financial crime training. Where applicable, this will be communicated to the parties involved.

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## **Annington's Approach to Assessing and Investigating Financial Crime Concerns**

Annington will investigate all allegations of financial crime activity involving Annington, its Employees or Third Parties, and take legal and/or disciplinary action in all cases where it is considered appropriate. Any reports received by Annington will be reported to the Board of Directors. The Financial Crime Officer in consultation with the Chair of the Board and/or Chair of the Audit Committee and/or CEO (depending on severity and/or individuals involved) will be deemed a 'Panel', and will decide whether to proceed with an internal investigation, the individuals conducting in the investigation and the form of such an investigation. The Financial Crime Officer will provide an update report to the Board at the next suitable time, no later than the next Board Meeting.

Any investigation may be managed by the Financial Crime Officer and/or the Chief Executive Officer and/or any other investigative officer deemed appropriate by the Board (acting in accordance with its designated procedures), who will report to the Board on a regular basis.

### **Enforcement and Discipline**

A breach of this Policy may result in an Employee facing disciplinary action, up to and including dismissal in addition to any other consequences. Annington may provide support and assistance to police or other relevant law enforcement agencies investigating alleged wrongdoing. In some instances, this may involve providing information or other assistance in connection with investigations and/or prosecutions of individuals formerly employed or retained by Annington.

Any non-Employee who breaches this Policy may have their contract terminated with immediate effect.

In all cases where Annington has suffered a financial loss due to wrongdoing by an Employee, it reserves the right to seek recovery in full, along with any costs it may incur as a consequence. Decisions about whether to take further action in such circumstances will be made by the Board, which will receive advice and recommendations from the Financial Crime Officer.

### **Record keeping**

Annington's records may form an important part of a financial crime investigation (whether an internal investigation conducted by Annington or an investigation conducted by an enforcement authority). In some circumstances, Annington may be compelled or required to produce documents or provide information about its financial crime processes to authorities investigating the conduct of customers, counterparties and others (even where Annington is not a subject of such investigations). Records may need to be retrieved and examined years after the event, perhaps even after an individual has left the Company. These records need to be readily accessible and understandable.

It is essential that we keep full and accurate records of all our financial dealings: transparency is vital. False, misleading, incomplete or poorly drafted records could be damaging to the Company.

All payments made or received by Annington must be accurately recorded in Annington's books and records. All financial transactions must be authorised by appropriate management in accordance with internal control procedures.

All due diligence documents and information must also be retained by Annington in accordance with relevant policies and agreements relating to data privacy and confidentiality.

## **4. MONEY LAUNDERING AND TERRORIST FINANCING**

### **Money Laundering**

Money laundering is the process by which criminals attempt to conceal the origin of proceeds of illegal activities. In other words, laundering is used as a method to break the link between the crime and the financial advantage it generates. Under Money Laundering, Terrorist Financing and Transfer of Funds

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(Information on the Payer) Regulations 2017 (as amended) (MLR 2017), money laundering may be committed by the person who commits the crime and then acquires, uses or otherwise deals with the proceeds of that criminal activity. Money laundering can also be committed by people whose only criminal involvement is to launder or deal with the proceeds of crime committed by others.

Under The Proceeds of Crime Act 2002 (as amended) (POCA), there are three potential ways to commit money laundering which apply to everyone in the UK. These laws apply equally to each individual and to Annington as a Company. Annington is committed to complying with all applicable AML, Counter Terrorism Financing and Anti-Bribery and Corruption laws and can only do so with your help.

Where you have suspicion or knowledge that the property is linked to a criminal offence in some way, you must not deal with this criminal property in any way. You must not transfer, convert, conceal, disguise or send out of the UK property which you suspect to be linked to crime, and you must not become involved in helping someone else to do that either. It is also an offence to possess, use or acquire the proceeds of crime, where you know or suspect that is what they are.

In the regulated sector, in addition to the above, firms are required to report suspicions of money laundering and to conduct checks on customers. As Annington does not perform any activities which require its inclusion in the regulated sector for AML purposes, it is not required by UK AML legislation to take these additional steps, which include identifying and verifying the identity of its customers or conduct ongoing monitoring of transactions involving its customers (although there may be occasions upon which this is still necessary to manage financial crime risk in other ways, or for commercial reasons). However, Annington's operations nonetheless may still expose Annington to the risk of providing services which could involve it dealing with the proceeds of criminal activity.

This Policy describes the steps Annington expects Employees to take to mitigate the risk of Annington becoming or being involved in transactions that have a connection with money laundering. This Policy also aims to assist Employees with identifying such situations and taking appropriate action.

### **Terrorist Financing**

Terrorists need funds to plan and carry out attacks. In general terms, terrorist financing is the provision or collection of funds from legitimate or illegitimate sources with the intention or in the knowledge that they should be used to carry out any act of terrorism, whether or not those funds are in fact used for that purpose.

The funds may come from legal sources, such as legitimate businesses, government funding and religious or cultural organisations, or from illegal sources, such as drug trafficking, kidnapping and/or government corruption. The funds may also come from an illegal source but appear to come from a legal source through money laundering.

Terrorist organisations may operate legitimate businesses (i.e. 'front companies') to generate profit for terrorist activities and to launder money. Terrorist financing can often also occur on a cross-border basis.

Failure, by any person, to disclose knowledge or suspicion of terrorist financing is a criminal offence under the Terrorism Act 2000. Terrorist financing may occur through methods that are similar to money laundering. However, the characteristics of terrorist financing (including the fact that we may only see a small proportion of an individual's or an entity's overall activity), can make it more difficult to detect than money laundering.

### **Suspicious circumstances and transactions**

There is no exhaustive list of what behaviour might indicate money laundering or terrorist financing on the part of a supplier, and there is no substitute for Employee alertness to unusual or suspicious activity. It is essential to be vigilant to any feature of a transaction or a business relationship, or any interaction which does not feel right, or does not add up. The following is a not an exhaustive or prescriptive list of red flags which should prompt further enquiries of customers/suppliers and/or escalation to the Financial Crime Officer as appropriate:

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- establishing or checking the supplier's identity is difficult;
- the supplier is reluctant to provide details of their identity or business incorporation, or provides documents which are not genuine or which have been altered;
- an agent reports that Know Your Client (KYC) checks on prospective tenants and/or purchasers is difficult to obtain or appears suspicious;
- any other circumstances that seem suspicious.

There are many things that might make you suspicious that someone is laundering the proceeds of crime. Employees should be alert and curious and use their knowledge of what is typically to be expected in the context of particular types of transactions and supplier relationships to identify "red flags" or other out of the ordinary features or interactions, which may in turn give rise to suspicions regarding money laundering or terrorist financing.

If apparent anomalies or concerns are not resolved by gathering further information from customers, matters must be reported promptly to the Financial Crime Officer. It is important that where you have concerns or suspicions, these are raised as soon as possible, and in particular well before Annington engages in any transactions or deals with any monies in connection with the unusual activity.

For details of how to report unusual or suspicious activity or red flags, please see the Reporting section below at section 7.



## 5. TAX EVASION

Tax evasion is a major issue in world trade, despite the many dedicated efforts to prevent it. It can be hugely damaging to the societies in which it occurs. It diverts money and resources from those who need them most, hindering economic and social development. Tax evasion affects us as a UK organisation if it is criminally facilitated anywhere in our business.

This section sets out the steps we must take to prevent fraud including the facilitation of tax evasion in our business and to comply with relevant legislation.

### What is Tax Evasion and How Does This Affect Us?

Tax evasion is the illegal non-payment or under-payment of taxes. It is usually perpetrated by falsely declaring or not declaring taxes due to the relevant tax authority. Tax evasion is a criminal offence. It can be committed by an individual, e.g. in relation to income tax, or a legal entity, e.g. in relation to corporation tax or VAT.

Circumstances in which tax evasion may occur in relation to our business include:

- structuring a transaction in such a way as to evade tax; or
- where a supplier asks us to pay them cash in hand or via some complex payment mechanism that allows them to evade tax.

The Criminal Finances Act 2017 (as amended) includes a corporate offence of failure to prevent the criminal facilitation of tax evasion. The offence has three ingredients, all of which must exist for criminal liability to arise:

- criminal tax evasion by a taxpayer, e.g. by a customer or supplier;
- criminal facilitation of that tax evasion by Annington's Employee, agent or any other person performing services for us or on our behalf; and
- failure by Annington to prevent our Employee, agent etc from committing the criminal facilitation.

This corporate offence can be committed regardless of whether the tax evaded is owed in the UK or in a foreign country and can occur in both the public and private sectors.

There is only one relevant defence to the corporate offence of failure to prevent the criminal facilitation of tax evasion and failure to prevent economic crime: if when the offence was committed, Annington had reasonable prevention procedures in place. This Policy is a central plank of those prevention procedures.

### Annington's Approach to the Criminal Facilitation of Tax Evasion

Involvement in the criminal facilitation of tax evasion is a criminal offence, bringing risks of substantial fines and possible personal criminal liability for individuals within Annington (which could lead to the imposition of fines and/or imprisonment). Such activity would also damage Annington's reputation and severely diminish the confidence of customers, suppliers and business partners.

Annington takes a zero-tolerance approach to tax evasion facilitation by Employees and our Third Party representatives. Annington is committed to taking steps to mitigate the risk that it could be unwittingly used in the facilitation of tax evasion.

This ethical stance is a non-negotiable for the Company.

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**Who can be Involved in Tax Evasion Facilitation and in What Circumstances?**

Tax evasion can be facilitated by our:

- Employees or anyone they authorise to do things on our behalf; and/or
- agents, intermediaries, representatives and any other person who performs services for Annington or on its behalf (together, 'associated persons'). Annington has a separate protocol, which sets out the due diligence steps required before and during the engagement of an agent or intermediary, to ensure the use of such an agent or intermediary does not improperly affect our business.

For criminal facilitation to occur, the associated person must:

- deliberately and dishonestly take action to facilitate the taxpayer-level evasion;
- do so in their capacity as an associated person of Annington.

**Common Indicators of Tax Evasion Facilitation**

Common indicators of tax evasion facilitation include those listed below, noting that this list is not exhaustive:

- request for payment by cash;
- overly-complex payment mechanisms;
- services/goods provided to high-risk tax jurisdictions or jurisdictions that have a low OECD tax transparency rating;
- transactions involving overly complex supply chains;
- transactions involving private banking facilities; and/or
- records are incomplete or missing.

**Reporting**

For details of how to report unusual or suspicious activity or red flags, please see the Reporting section below at section 7.

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## 6. ANTI-BRIBERY AND CORRUPTION

Bribery and corruption distort competition and investment, hinders free and fair trade, and represent unacceptable costs to our business.

Annington adopts a zero-tolerance approach to any form of bribery and corruption, and requires all individuals, organisations and Third Parties associated with it to act with honesty and integrity at all times. Annington's expectation on propriety and accountability is that Employees, anyone performing services on behalf of it, and any Third Parties associated with it at all levels will lead by example. Annington will not tolerate any Employee, Third Party or anyone else performing services on behalf of Annington being involved in any type or level of bribery and/or corruption. Employees, Third Parties and others performing services on behalf of Annington are required to report any circumstances or suspicions which are in breach of this Policy immediately. All reported incidences of actual or suspected bribery or corruption will be promptly and thoroughly investigated and dealt with appropriately.

Annington has in place clear systems and procedures to assist in the prevention of bribery and corruption which are regularly reviewed to ensure that they remain effective in the prevention and detection of bribery and corruption.

### **Bribery and Corruption**

Annington's business activities may give rise to certain vulnerabilities to bribery and corruption. This is principally because it works closely with Government Officials, and construction companies, and is involved in projects which potentially include complex supply chains and the purchase of large volumes of materials and services.

Bribery means offering, promising or giving anything of value (whether directly or indirectly) to improperly influence another in order to obtain or retain business for Annington; or requesting, soliciting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business by Annington.

Bribes can take the form of money (including facilitation (or 'grease') payments), gifts, hospitality, entertainment, expenses, reciprocal favours, political or charitable contributions, or any direct or indirect benefit or consideration.

It is illegal to pay or receive, offer, promise or request a bribe, whether directly or indirectly.

There is no need for the bribe to be successful in order for it to be viewed as corrupt. The offering of it is enough to amount to a criminal offence. It does not matter whether the person who is improperly performing their function or activity is the same person who receives the bribe. It does not matter whether the bribe relates to dealings with the public or private sectors.

### **Gifts, Hospitality, Entertainment and Travel Expenses**

Providing gifts, hospitality and/or travel to Third Parties and receiving them from Third Parties is sometimes appropriate in the normal course of business. However, gifts, hospitality and/or travel must not be given or received in order to unfairly influence business decisions or to influence the improper performance of any function. All employees must confirm they have read the Gifts & Hospitality Policy and are familiar with the approval process.

Under no circumstances may cash or cash equivalents be given or accepted from any Third Party.

Gifts, hospitality and entertainment may never be given to Government Officials irrespective of whether there is a negotiation occurring or not, save for a GBP£10 per person de minimis limit for sandwich lunches during meetings held at Annington's offices, where appropriate.

All business gifts, hospitality and business entertainment must comply with Annington's Gifts and Hospitality Policy, a copy of which can be located on the Company's Intranet or available on request.

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## **Political and Charitable Donations**

Annington does not make any political donations.

Annington only makes charitable donations which are legal and ethical.

Charitable donations are permissible provided the donation is not made for the personal, financial, or political benefit of any Government Official, or any customer/supplier/Third Party (or their families). Donations must not be made to improperly influence the recipient or in exchange for any business advantage.

Prior approval from Annington's CEO must be obtained before requesting or authorising any charitable donations on behalf of Annington.

Please see Annington's Gifts and Hospitality Policy for further details, a copy of which can be located on the Company's Intranet and on request.

## **Third Party Payments, Use of Agents and Due Diligence**

You must not make a payment to a Third Party if you know or suspect that the person may use or offer all or a portion of the payment directly or indirectly as a bribe.

Employees must ensure that Third Parties engaged on behalf of Annington are legitimate service providers. Before engaging any such party, Employees are required to assess the risk associated with the Third Party and undertake appropriate due diligence checks commensurate with the level of risk, including the completion of a pre-contract enquiries checklist and provision of details of the nature of the proposed project or transaction. All paperwork and records documenting the due diligence checks should be retained. For further information on Annington's record keeping procedures, please see the Data Protection Policy a copy of which can be located on the Company's Intranet.

If you are in any doubt whatsoever about the legitimacy of a proposed Third Party where you believe the Third Party to present a higher risk, or when any relevant Red Flags are present, you must discuss your concerns with the Financial Crime Officer prior to entering into any arrangements with the Third Party.

For details of how to report unusual or suspicious activity or red flags, please see the Reporting section below at section 7.

## **Consequences for Breach of Anti-Bribery and Corruption Laws**

Bribery is a criminal offence under the Bribery Act 2010.

**Consequences for individuals:** A person who gives or receives a bribe, regardless of whether the activity takes place in the UK or overseas, may be imprisoned for up to 10 years and/or face an unlimited fine. Directors may also be disqualified. Individuals may also be subject to disciplinary action, up to and including dismissal from the company.

**Consequences for Annington:** Annington can also be held criminally responsible for the corrupt acts of Employees, Third Parties and anyone performing services on behalf of Annington. Consequences may include the company facing an unlimited fine, damage to the corporate brand and reputation of Annington, debarment from bidding for government contracts, loss of business, legal action by competitors, litigation and substantial investigation time and expense.

In addition, under certain circumstances the Executive Directors and other members of senior management of Annington can be held personally liable for the breaches committed by Employees, Third Parties and anyone performing services on behalf of Annington and face significant fines and/or imprisonment.

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## 7. REPORTING

Annington has appointed a Financial Crime Officer who is responsible for ensuring that this Policy is complied with, and for dealing with any money laundering, terrorist financing, bribery, corruption or tax evasion (and other fraud) concerns raised by Employees.

We all have a responsibility to speak out if we discover anything corrupt or otherwise improper occurring in relation to, or through, our business. All Employees, Third Parties and anyone performing services on behalf of Annington are required to notify the Financial Crime Officer of any suggestions of financial crime or other unusual activity or breaches of this Policy immediately. This includes concerns around money laundering, terrorist financing, bribery, corruption, tax evasion, fraud and/or any other type of criminal activity, whether by another Employee or staff member, a Third Party, anyone who represents or acts on behalf of Annington, a supplier or competitor, a client or customer or anyone else. Employees must make a report as soon as reasonably practicable and will be required to explain any delays.

The threshold for suspicion is low and any Employee who notes an unusual or suspicious feature of a transaction or client relationship must escalate this to the Financial Crime Officer without delay so it can be dealt with appropriately.

The reporting process is straightforward, and involves completing a Financial Crime Report Form, which can be found on Annington's Intranet (and also at Appendix 1).

This form should be completed as fully as possible and sent promptly and directly to the Financial Crime Officer. In particular, reasons for concern should be set out in detail including the reasons you think that this particular customer or transaction may be involved in financial crime. Reports should not be submitted anonymously. All reports will be treated as highly confidential, and it is essential that you do not discuss your completed report with anyone except the Financial Crime Officer. It is particularly important that you do not discuss a report with the subject of the report or in any way imply that a report has been made. No discussion of the matter should occur separate to the report, unless first approved by the Financial Crime Officer. If discussion does occur, this may be deemed 'tipping off', which is an offence under the MLR 2017.

Written reports submitted to the Financial Crime Officer will be acknowledged in writing. The Financial Crime Officer will decide upon next steps including any whether or not an investigation is required. You will be provided with further information on a 'need-to-know' basis. The Financial Crime Officer will complete the Financial Crime Officer Report Form, which can also be found at Appendix 2.

Where a report is submitted to the Financial Crime Officer prior to a transaction being completed, absolutely no further action may be taken until the Financial Crime Officer confirms next steps. This means the transaction must not proceed without the Financial Crime Officer's approval. Failure to observe this requirement may result in you committing a criminal offence. Please be aware that confirmation of next steps may not be immediate. The Financial Crime Officer may provide direction as to how client interactions should be managed during this period. These directions must be adhered to, otherwise you risk committing a criminal offence.

For further information on confidential reporting, please see Annington's Whistleblowing Policy which is available on the Company's Intranet and on request. Further details are also contained in the Employee Handbook, which can also be found on the Company's Intranet.

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**DOCUMENT DETAILS**

<b>Policy Number</b>	ANN-POL-020	<b>Version No</b>	V.1.0
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<b>Policy Owner</b>	Head of Legal	<b>Policy Approved By</b>	Annington Ltd Board

**Internal Compliance Version Only  
VERSION HISTORY**

<b>VERSION</b>	<b>AUTHOR</b>	<b>REVISION DATE</b>	<b>CHANGES</b>
V.1.0	Head of Legal and Director of Finance (drafted by Eversheds Sutherland LLP)	March 2025	Policy finalisation. Policy amalgamates previous Anti-Money Laundering Handbook, Anit- Bribery & Corruption Policy and CCO Policy).

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**APPENDIX 1****FINANCIAL CRIME REPORT FORM**

Complete this form if you know or suspect a business relationship or transaction is connected with financial crime.

Once you have completed it, send it promptly to the Financial Crime Officer.

**Reporting member of staff**

Name: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Party about whom you are reporting**

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Telephone: \_\_\_\_\_

Passport number or ID card number (for individuals):  
\_\_\_\_\_

Nationality (for individuals):  
\_\_\_\_\_

Date of birth (for individuals): \_\_\_\_\_

**Suspicion**

Transaction or information giving rise to suspicion (including date):  
\_\_\_\_\_  
\_\_\_\_\_

Reason for suspicion:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Any additional information (attach further sheets if necessary): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Reporter's signature:** \_\_\_\_\_

**Date of report:** \_\_\_\_\_

**APPENDIX 2**

**FINANCIAL CRIME OFFICER REPORT FORM**  
*This form is for the use of the Financial Crime Officer only*

Report reference assigned:

\_\_\_\_\_

Date report received:

\_\_\_\_\_

Time report received:

\_\_\_\_\_

Enquiries undertaken (attach documentary evidence as necessary):

Report passed to National Crime Agency (NCA)? (circle one):    Yes    No

If **yes**, date report passed to NCA:

\_\_\_\_\_

Response received from NCA (date and content):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Follow-up action required:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

If **no**, reason for non-disclosure:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Financial Crime Officer signature:

Date: