

Financial Crime Compliance Statement of Principles



November 2021

Anti-Money Laundering and Counter-Terrorist Financing

Man Group is committed to complying with all applicable Anti-Money Laundering (“AML”), Counter Terrorist Financing (“CTF”) laws and has designed a financial crime programme including policies and procedures to underpin it.

The key tenets of the policy are:

- Ongoing oversight by senior management
- A written risk assessment to identify and assess the risks of money laundering and terrorist financing at the Firm, taking into consideration multiple factors
- Know-Your-Client and due diligence checks at the points of onboarding and on a periodic refresh basis subject to a risk-based approach. Enhanced due diligence for higher risk situations
- Ongoing monitoring through screening and oversight forums
- Documented and communicated process for reporting suspicious activity
- Annual training provided with additional in-person training given for those working in certain areas
- Independent assurance and audit to assess the adequacy and effectiveness of processes, systems, and controls

Anti-bribery and Corruption

Man Group is fully committed to complying with all applicable laws and regulations designed to combat bribery and corruption. We seek to win or retain business based on merit, excellence, and performance, not through any form of bribery and corruption.

Man Group has a zero-tolerance policy for bribery and corruption, and we expect those who provide services to us, or who work on our behalf, to have the same commitment wherever in the world they are doing business.

The core principles of the Anti-Bribery and Corruption Policy are:

Employees and anyone conducting business for or on behalf of Man must not:

- Authorise, offer, promise or give anything of value to improperly influence the recipient
- Request, agree to receive or accept anything of value to improperly influence behaviour
- Offer anything of value to a public official (or to someone connected to a public official) to influence them in their capacity as a public official
- Make any facilitation or ‘grease’ payments

Financial Sanctions

Man Group is committed to complying with all applicable International Sanctions laws and regulations. With operations in multiple countries international sanctions compliance is an important part of the financial crime programme. Key parts are:

- Policies and Procedures in relation to sanctions
- Training of our employees to escalate links to sanctioned individuals and entities
- KYC, due diligence, and screening protocols to identify potential links and associations to sanctioned subjects and prohibited securities
- Annual training is provided with additional in-person training given for those working in certain areas
- Independent assurance and audit to assess the adequacy and effectiveness of processes, systems, and controls

Facilitation of Tax Evasion

Man Group applies a zero-tolerance policy with respect to any criminal facilitation of tax evasion, including the criminal facilitation of tax evasion by an associated person. We are fully committed to complying with all applicable laws designed to prevent tax evasion and the facilitation of tax evasion in the jurisdictions in which we, our clients, our suppliers, and our business partners operate.