



# Financial crime policy

## Policy statement

M Group Ltd is committed to acting professionally, honestly and with integrity in all business dealings and, as such, has a zero-tolerance approach to any form of financial crime or corrupt activity. This policy details our requirements to ensure all our activities are conducted in accordance with legislation relating to bribery and corruption, fraud, money laundering, sanctions and corporate criminal offences.

## Our approach

We have a group-wide financial crime procedure that details the specific requirements that must be complied with across the group. The key principles are:

**Bribery:** bribery is defined by The Bribery act 2010 as offering, giving, receiving or soliciting something of value to influence an action or decision. This activity is illegal in the UK and as such is strictly prohibited by us. The following must be adhered to:

- Facilitation payments are prohibited.
- Political donations are prohibited.
- No payments may be made to any other party in cash.
- Charitable donations must be made in line with the group charitable donations policy, available from your People team.
- Gifts and hospitality can only be offered or received in line with the requirements and approvals outlined in the group financial crime procedure and must be recorded on the gifts and hospitality register.

**Corruption:** corruption is the abuse of an entrusted power or position for private gain. The UK Bribery act makes all forms of corruption illegal and as such we strictly prohibit this. The risks of corruption are not always obvious and so all individuals and parties acting on behalf of us must adhere to the following:

- Not to make payments to someone or favour them in any other way if this may involve them misusing their position or performing their function improperly
- Not to misuse your position, or perform your function improperly, in connection with payments or favours for yourself or others
- If anyone acting on behalf of us needs to promote our business with a foreign public official, or someone working at an overseas publicly owned organisation, this must always be checked in advance with the Group general counsel.
- Conflicts of interest arise when two or more interests compete with the potential to compromise independence or judgement. To ensure independence/judgement is not compromised, all individuals and parties

acting on behalf of us must familiarise themselves with the requirements detailed within our Group financial crime procedure and declare all potential conflicts of interest on the conflicts of interest register.

**Fraud:** fraud can be defined as any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. Fraud has the potential to harm our business and create financial loss. All fraudulent activity is prohibited by us and any concerns that fraud is taking place should be reported immediately in accordance with our Group whistleblowing policy.

**Anti-money laundering:** money laundering is the process that turns the proceeds of criminal activity into funds that appear lawful and is illegal under the Proceeds of crime act 2002. While we're not a high-risk organisation for money-laundering, all parties working for, or on behalf of, must ensure appropriate due diligence is completed on all parties we engage with, and any suspicious activity is reported immediately in accordance with our whistleblowing policy.

**Trade and economic sanctions:** The UK sanctions regime imposes serious and extensive restrictions on dealing with people who are listed ('designated persons') such that even legitimate payments cannot be made to or received from them. The Group adopts a risk-based approach to ensure that the sanctions regime is complied with. This includes periodic checking of clients, suppliers, subcontractors and individuals against the sanctions list, including before engaging them. All parties working for, or on behalf of, our Group must follow all procurement and people policies and notify any matches, or close matches, with the sanctions list to the Group general counsel immediately. Payments must not be made to or received from that individual, or entity, until advice has been received from the Group general counsel.

Corporate criminal offences: Tax evasion is where there is a deliberate attempt not to pay tax which is due. The criminal finances act 2017 makes tax evasion, and the facilitation of tax evasion, illegal. If any party acting on behalf of our Group facilitates tax evasion and we cannot demonstrate that reasonable procedures were in place to prevent this, we could be guilty of a corporate criminal offence. All parties working for, or on behalf of our Group must not undertake any transactions which could commit tax evasion, nor facilitate tax evasion by another party and must complete all required mandatory training.

### Responsibilities and further information

It is the responsibility of every individual working for, or on behalf of, our Group to comply with this policy and the financial crime procedure (MGS-PRO-LEG-001) document. Failure to adhere to this policy may lead to disciplinary action including dismissal against individuals and/or termination of relationships with others, such as third-party service providers.

If you have any queries relating to any of the areas covered by this policy, please contact the general counsel in the first instance.

<b>Ref:</b>	<b>Policy Owner:</b>	<b>Date:</b>	<b>Date of Review:</b>
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