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## Statement of Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) policies and principles

Money Laundering and Terrorist Financing have been identified as major threats to the CJS Payroll and, indeed, the international financial services community. The United Kingdom, in common with many other countries, has passed legislation designed to prevent money laundering and to combat terrorism.

### *Legal and regulatory framework*

The principal requirements, obligations and penalties, on which CJS Payroll financial crime systems and controls are based, are contained in:

- The proceeds of Crime Act 2002 (POCA), as amended by the:
    - i. Serious Organized Crime and Police Act 2005 (SOCPA); and the
    - ii. Proceeds of Crime Act (amendment) Regulations 2007;
  - The Terrorism Act 2000, as amended by the:
    - i. The Anti Terrorism, Crime & Security Act 2001; and the
    - ii. Terrorism Act (amendment) Regulations 2007;
  - The Terrorism Act 2006;
  - The Bribery Act 2010;
  - The Money Laundering Regulations 2007, transposing the requirements of the E.U's third money laundering directive;
  - The FCA handbook of rules and guidance, and in particular, the senior management arrangements, systems and controls (SFFISC) sourcebook, which relates to the management and control of money laundering risk; and
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- The Joint Money Laundering Steering Group (JMLSG) guidance for the UK financial sector on the prevention of money laundering / combating terrorist financing.

### *CJS Payroll policies & principles*

CJS Payroll is responsible for the following policies covering:

- a. Anti-Money Laundering/Counter-Terrorist Financing/Counter-Proliferation Financing;
- b. Training;
- c. Anti-Bribery & Anti-Corruption; and
- d. Introducers.

These policies and principles are designed to ensure that all group companies comply with the legal and regulatory requirements applicable in the UK as well as with their local obligations.

### Anti-Money Laundering (A.M.L) policy

CJS Payroll A.M.L policy is designed to ensure that comply with the requirements and obligations set out in UK legislation, regulations, rules and industry guidance for the financial services sector, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime. The A.M.L policy sets out the minimum standards which must be complied with by all CJS Payroll companies and includes:

- Establishing and maintaining risk-based customer due diligence, identification, verification and know your customer (KFFIC) procedures, including enhanced due diligence for those customers presenting higher risk, such as politically exposed persons (peps) and correspondent banking relationships;
- Establishing and maintaining risk based systems and procedures to monitor ongoing customer activity;
- Procedures for reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate;
- The maintenance of appropriate records for the minimum prescribed periods;
- Training and awareness for all relevant employees; and
- The provision of appropriate management information and reporting to senior management of the group's compliance with the requirements.

## Training

All employees receive training on the Anti Money Laundering and Counter Terrorist Financing policies and principles at least once a year, with more detailed and advanced training for those whose roles involve major financial risks. Failure to comply with these policies and principles may give rise to disciplinary action, up to and including dismissal.

## Anti-Bribery & Anti-Corruption policy

CJS Payroll has a zero tolerance policy towards bribery and corruption. CJS Payroll recognizes that bribery and corruption have an adverse effect on communities wherever they occur. If endemic, they can threaten laws, democratic processes and basic human freedoms, impoverishing states and distorting free trade and competition. Corruption is often associated with organized crime, money laundering and on occasions the financing of terrorism. In addition, the level and efficacy of investment and financing can be reduced, particularly within economically disadvantaged societies.

CJS Payroll is committed to applying high standards of honesty and integrity consistently across our global operations and in all our business dealings. We are subject to the provisions of the UK bribery act 2010 and the U.S foreign corrupt practices act, which have extra-territorial effect globally, as well as applicable local anti-bribery laws in relevant jurisdictions.

## Introducers

In addition to the anti-bribery and anti-corruption policy, CJS Payroll has an introducer clause described in the Introducer agreement. The clause covers the activities of all third parties that generate or retain business, or secure a business benefit, for CJS Payroll. These third parties are termed "introducers" by CJS Payroll. Potential examples would include senior advisors, lead generators and existing clients of CJS Payroll. CJS Payroll introducer policy is designed to protect CJS Payroll against the bribery and corruption risks, reputational risk, and wider operational and conduct risks associated with introducers. CJS Payroll employees must apply the specific controls and procedures set out in the policy.

## *CJS Payroll governance & conformance*

Regular reviews of the effectiveness of these group policies are carried out in addition to audits periodically undertaken by CJS Payroll internal audit function. This provides senior executive management oversight committees and the board audit committee with the necessary assurance regarding the operating effectiveness of the group's controls relating to these policies.