the Wolfsberg Group

Financial Institution Name: Location (Country): Royal London Asset Management limited
United Kingdom

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal name	Royal London Asset Management Limited
2	Append a list of foreign branches which are	Not applicable
	covered by this questionnaire	
2	Full Legal (Registered) Address	
3	ruii Legai (Registered) Address	80 Fenchurch Street, London, EC3M 4BY
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	14/04/1988
	, ,	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No V
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	100% Royal London Mutual Insurance Society Limited
7	% of the Entity's total shares composed of bearer shares	Nil
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No 🔻
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No 🔽
10	Provide Legal Entity Identifier (LEI) if available	213800VJ1GMACBBTYZ14
	FF & SANCTIONS PROGRAMME	
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Not Applicable
	I CDD	Yes
11 e 11 f	CDD EDD	Yes

11 g	Independent Testing	Yes	
11 h	Periodic Review	Yes	
11 i	Policies and Procedures	Yes	
11 j	PEP Screening	Yes	
11 k	Risk Assessment	Yes	
11 I	Sanctions	Yes	
11 m	Suspicious Activity Reporting	Yes	
11 n	Training and Education	Yes	
11 o	Transaction Monitoring	Yes	
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes	•
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No	•
13 а	If Y, provide further details		
14	Does the entity have a whistleblower policy?	Yes	$\overline{}$
	RIBERY & CORRUPTION	165	
3. ANTI B	I		
	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	•
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	•
17	Does the Entity provide mandatory ABC training to:		
17 a	Board and Senior Committee Management	Yes	
17 b	1st Line of Defence	Yes	V
17 c	2nd Line of Defence	Yes	
17 d	3rd Line of Defence	Yes	=
17 a	Third parties to which specific compliance activities	165	=
17 6	subject to ABC risk have been outsourced	Not applicable	lacksquare
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes	
4. AML, C	TF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
18 a	Money laundering	Yes	\blacksquare
18 b	Terrorist financing	Yes	
18 c	Sanctions violations	Yes	
19	Does the Entity have policies and procedures that:		_
19 a	Prohibit the opening and keeping of anonymous	Yes	—
19 b	and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	
19 d	Prohibit accounts/relationships with shell banks	Yes	
19 e	Prohibit accounts/relationships with shell banks Prohibit dealing with another Entity that provides services to shell banks	Yes	V
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	
19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	•
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	•
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	•
19 j	Outline the processes regarding screening for		
	sanctions, PEPs and Adverse Media/Negative News	Yes	V

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20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	lacksquare
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	lacksquare
21 a	If Y, what is the retention period?	5 years or more	•
5. KYC, C	DD and EDD		
22	Does the Entity verify the identity of the customer?	Yes	
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	•
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	lacksquare
24 b	Expected activity	Yes	
24 c	Nature of business/employment	Yes	
24 d	Ownership structure	Yes	
24 e	Product usage	Yes	
24 f	Purpose and nature of relationship	Yes	V
24 g	Source of funds	Yes	
24 y 24 h	Source of runds Source of wealth		=
24 n 25		Yes	
	Are each of the following identified:	lv.	_
25 a	Ultimate beneficial ownership	Yes	
25 a1	Are ultimate beneficial owners verified?	Yes	
25 b	Authorised signatories (where applicable)	Yes	
25 c	Key controllers	Yes	
25 d	Other relevant parties	Yes	
26	Does the due diligence process result in customers receiving a risk classification?	Yes	
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	•
28	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	•
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	-
29 a	If yes, select all that apply:		
29 a1	Less than one year	No	
29 a2	1 – 2 years	Yes	
29 a3	3 – 4 years	Yes	\equiv
29 a4	5 years or more	Yes	\equiv
29 a5	Trigger-based or perpetual monitoring reviews	Yes	V
29 a6	Other (please specify)		
30	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
30 a	industries are subject to EDD and/or are restricted, or	EDD on risk-based approach	
30 a 30 b	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	EDD on risk-based approach Do not have this category of customer or industry	
30 a	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? Arms, Defence, Military	**	
30 a 30 b	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? Arms, Defence, Military Respondent Banks If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the	Do not have this category of customer or industry	
30 a 30 b 30 b1	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? Arms, Defence, Military Respondent Banks If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates	Do not have this category of customer or industry Yes EDD on risk-based approach	
30 a 30 b 30 b1 30 c 30 d	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? Arms, Defence, Military Respondent Banks If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries	Do not have this category of customer or industry Yes EDD on risk-based approach EDD on risk-based approach	
30 a 30 b 30 b1 30 c 30 d 30 e	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? Arms, Defence, Military Respondent Banks If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers	Do not have this category of customer or industry Yes EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach	V
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30 a 30 b 30 b1 30 c 30 d 30 e 30 f 30 g 30 h	industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme? Arms, Defence, Military Respondent Banks If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022? Embassies/Consulates Extractive industries Gambling customers General Trading Companies Marijuana-related Entities MSB/MVTS customers	Do not have this category of customer or industry Yes EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach EDD on risk-based approach Prohibited Prohibited	\ \ \ \ \

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39 o PEP Close Associates EDD on risk-based approach 39 o PEP Related EDD on risk-based approach 39 o PEP Related EDD on risk-based approach 39 o PEP Related To Combine Service Servi		Payment Service Providers	EDD on risk-based approach	
39 P PEP Related 50 P Procious metals and stones 50 P Regulated charities 50 T Regulated char		PEPs	EDD on risk-based approach	V
39 q Products metable and stories 30 r Red light businesses/Adult entertainment 30 r Red light businesses/Adult entertainment 30 r Red light businesses/Adult entertainment 30 r Shell banks 31 r Shell banks 32 Shell banks 33 r Shell banks 34 Shell banks 35 Shell banks 36 r Shell banks 36 r Shell banks 37 Shell banks 38 Shell banks 39 Shell banks 39 Shell banks 30 r Shell banks	30 о	PEP Close Associates	EDD on risk-based approach	
39 F Regulated charties R	30 p	PEP Related	EDD on risk-based approach	V
30 s Regulated charities	30 q	Precious metals and stones	EDD on risk-based approach	lacksquare
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37 b Local Regulations 37 b If Y, Specify the regulation 37 c If N, explain As The Royal London Asset Management Limited is not a bank it does not handle wire transactions therefore we feel that this question is not applicable. Our bank handles any such transactions so would have sufficent controls in place under UK banking regulations. 8. SANCTIONS 38 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? 39 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in	37	processes to comply with and have controls in		
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	39	controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in	Yes	•

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	•	
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:			
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering tran	•	
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering trar	•	
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering tran	•	
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering tran	V	
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering tran	sact	
41 f	Other (specify) Does the Entity have a physical presence, e.g.			
	branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	•	
	IG & EDUCATION			
43	Does the Entity provide mandatory training, which includes:			
43 a	Identification and reporting of transactions to government authorities	Yes	\blacksquare	
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	•	
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	V	
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	•	
44	Is the above mandatory training provided to :			
44 a	Board and Senior Committee Management	Yes		
44 b	1st Line of Defence			
44 c 44 d	2nd Line of Defence			
44 u 44 e	3rd Line of Defence	Yes		
44 6	Third parties to which specific FCC activities have been outsourced	Not Applicable	\blacksquare	
44 f	Non-employed workers (contractors/consultants)	No		
10. AUDIT	, , , , , , , , , , , , , , , , , , ,			
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes	•	
Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)				
Royal Londor	Asset Management Limited	(Financial Institution name)		
I, understood thi		pliance Manager- Second Line representative), certify that I have read and the and correct to my honest belief.	d	
John Nicol NOV-07-2024 (Signature & Date)				