



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 covered by this questionnaire	Not applicable
3	Full Legal (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 
6 d	Privately Owned	No
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
2. AML, CTF & 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 
11 e	CDD	Yes 
11 f	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 l	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 a	If Y, provide further details		
14	Does the entity have a whistleblower policy?	Yes	☐
3. ANTI BRIBERY & CORRUPTION			
15	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	☐
17 c	2nd Line of Defence	Yes	☐
17 d	3rd Line of Defence	Yes	☐
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not applicable	☐
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes	☐
4. AML, CTF & 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	☐
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 and fictitious named accounts	Yes	☐
19 b	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 dealing with another Entity that provides services to shell banks	Yes	☐
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	☐

20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	v
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	v
21 a	If Y, what is the retention period?	5 years or more	v
5. KYC, CDD and EDD			
22	Does the Entity verify the identity of the customer?	Yes	v
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	v
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	v
24 b	Expected activity	Yes	v
24 c	Nature of business/employment	Yes	v
24 d	Ownership structure	Yes	v
24 e	Product usage	Yes	v
24 f	Purpose and nature of relationship	Yes	v
24 g	Source of funds	Yes	v
24 h	Source of wealth	Yes	v
25	Are each of the following identified:		
25 a	Ultimate beneficial ownership	Yes	v
25 a1	Are ultimate beneficial owners verified?	Yes	v
25 b	Authorised signatories (where applicable)	Yes	v
25 c	Key controllers	Yes	v
25 d	Other relevant parties	Yes	v
26	Does the due diligence process result in customers receiving a risk classification?	Yes	v
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	v
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	v
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	v
29 a	If yes, select all that apply:		
29 a1	Less than one year	No	v
29 a2	1 – 2 years	Yes	v
29 a3	3 – 4 years	Yes	v
29 a4	5 years or more	Yes	v
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	Arms, Defence, Military	EDD on risk-based approach	v
30 b	Respondent Banks	Do not have this category of customer or industry	v
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	
30 c	Embassies/Consulates	EDD on risk-based approach	v
30 d	Extractive industries	EDD on risk-based approach	v
30 e	Gambling customers	EDD on risk-based approach	v
30 f	General Trading Companies	EDD on risk-based approach	v
30 g	Marijuana-related Entities	Prohibited	v
30 h	MSB/MVTS customers	Prohibited	v
30 i	Non-account customers	Prohibited	v
30 j	Non-Government Organisations	EDD on risk-based approach	v
30 k	Non-resident customers	EDD on risk-based approach	v

30 l	Nuclear power	EDD on risk-based approach	
30 m	Payment Service Providers	EDD on risk-based approach	
30 n	PEPs	EDD on risk-based approach	
30 o	PEP Close Associates	EDD on risk-based approach	
30 p	PEP Related	EDD on risk-based approach	
30 q	Precious metals and stones	EDD on risk-based approach	
30 r	Red light businesses/Adult entertainment	Prohibited	
30 s	Regulated charities	EDD on risk-based approach	
30 t	Shell banks	Prohibited	
30 u	Travel and Tour Companies	EDD on risk-based approach	
30 v	Unregulated charities	EDD on risk-based approach	
30 w	Used Car Dealers	EDD on risk-based approach	
30 x	Virtual Asset Service Providers	Prohibited	
30 y	Other (specify)		
31	If restricted, provide details of the restriction	Each case is considered on its merits. Depending on the level of risk presented the company may either restrict the available product range or decline/exit the relationship altogether.	
6. MONITORING & REPORTING			
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Payments out that do not match any customer profile	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	
7. PAYMENT TRANSPARENCY			
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	No	
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	No	
37 b	Local Regulations	No	
37 b1	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 sufficient 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?	Yes	
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 cross border transactions?	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	v
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 tra	v
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 tra	v
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering tra	v
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering tra	v
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transacti	v
41 f	Other (specify)		
42	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	v
9. TRAINING & EDUCATION			
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	v
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	v
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	v
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	v
44 b	1st Line of Defence	Yes	v
44 c	2nd Line of Defence	Yes	v
44 d	3rd Line of Defence	Yes	v
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	v
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	v
Signature Page Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2) Royal London Asset Management Limited _____ (Financial Institution name) I, <u>John Nicol, RLAM CRO & MLRO</u> (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief. <u>John Nicol</u> Feb-17-2026 _____, (Signature & Date)			