

Marathon Asset Management Limited (“Marathon”)

**Policy Statement and Procedures in Relation to Anti-Money Laundering and
Combating Terrorist Financing and other Financial Crime**

Marathon and its affiliates are fully committed to playing its part in the international effort to detect and prevent money laundering, terrorist financing and other financial crime activities. Equal commitment is given to compliance with economic sanctions laws and regulations.

Marathon has developed and maintained appropriate procedures in respect of client identification, know your customer, ongoing screening, appropriate staff training and suspicious transaction reporting. The aim of such activities, undertaken as part of the overall Compliance Monitoring Programme, is designed to detect and report suspected money laundering, terrorist financing, other financial crime activities and activity prohibited by sanctions.

Marathon is subject to, and bound to comply with, the AML/CTF and other financial crime legislation and sanctions laws and regulations in each of the jurisdictions in which it operates. A senior manager has been appointed Money Laundering Reporting Officer (“MLRO”) and approved by the FCA, and facilitates the senior management and the Board in establishing and maintaining a compliant anti-financial crime framework at Marathon.

In accordance with relevant legislative and regulatory requirements, the anti-financial crime framework at Marathon includes:

- The adoption of AML/CTF/anti-financial crime policies and procedures is the responsibility of the senior management at Marathon and those policies and procedures are ratified by the Board on an annual basis.
- Documented policies and procedures address anti-financial crime and sanctions matters which are easily accessible to all staff.
- Appropriate controls and procedures are in place to prevent fraud, these are easily accessible to all staff.
- Identity of all clients is established prior to acceptance based on guidance provided within the JMLSG Guidance Notes and other relevant guidance. JMLSG Guidance is updated regularly to ensure ongoing compliance with legislative requirements.
- Adequate know your customer information is maintained for the duration of the business relationship and for an appropriate period post-termination.
- Appropriate training is given to relevant staff on joining and periodically thereafter.
- Appropriate monitoring of transactions is undertaken by the MLRO and suspicious transactions reported where identified.
- Customer and transaction screening against terrorist and other sanctions watch-lists.
- An annual financial crime risk assessment is undertaken together with an evaluation of systems and controls, covering money laundering, terrorist financing, sanctions, bribery, fraud and corporate tax evasion.
- Ongoing reporting to the Risk Audit and Compliance Committee and the Board from the MLRO.
- Independent testing of control effectiveness by a third party.