

Global Financial Crime Statement



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Financial crime can have a profound and lasting impact on victims and can also create significant economic and social harm. As a responsible and trusted organisation, Davies recognises the vital role we play in helping to deter criminals from exploiting the financial system to move or conceal the proceeds of illegal activity.

Davies maintains a Financial Crime Risk Management Framework which sets out the policies, systems, and controls designed to prevent, detect, investigate, and report financial crime. We recognise that there is inherent financial crime risks associated with delivering certain regulated and non-regulated services across our business.

We have no appetite for failing to meet our legal, regulatory, or ethical responsibilities in managing financial crime risk. We are committed to ensuring that our operations, services, and people remain within clearly defined and acceptable risk tolerances, and that we fulfil our obligations in supporting a secure and compliant operating environment for all stakeholders.

This statement outlines Davies' commitment and approach and does not replace detailed internal policies and procedures.

Purpose and Commitment

Davies is committed to conducting business with integrity, transparency, and the highest ethical standards. As a global organisation, we maintain a zero-tolerance approach to financial crime in all its forms, including fraud, bribery and corruption, money laundering, terrorist financing, market abuse, tax evasion, sanctions breaches, and facilitation of illicit activity.

Global Standards and Regulatory Alignment

Davies operates across multiple jurisdictions and complies with all applicable laws, regulations, and industry standards designed to prevent financial crime. This includes, but is not limited to:

- Anti Money Laundering (AML) and Counter Terrorist Financing (CTF) legislation
- Proliferation financing
- Anti Bribery and Corruption (ABC) laws
- The UK Economic Crime and Corporate Transparency Act 2023, including the offence of failure to prevent fraud
- Economic and financial sanctions programmes
- Tax evasion and tax evasion facilitation
- Fraud
- Market abuse
- Industry codes of conduct

Where local regulations differ, Davies applies the higher standard to ensure consistent global protection.

Governance and Accountability

Davies maintains a robust governance framework to identify, manage, and mitigate financial crime risks. Oversight is provided by senior leadership, with clear lines of accountability throughout the organisation. Dedicated compliance specialists support each business unit, while Group Compliance provides enterprise-wide direction, policy management, and assurance.



All employees, contractors, and third-party partners are expected to follow Davies' financial crime policies and act in accordance with our ethical values. Breaches are investigated promptly, and appropriate disciplinary or contractual action may be taken.

Risk Management and Culture

Davies employs a comprehensive suite of risk-based controls designed to prevent, detect, and respond to financial crime threats. These include:

- Client and third-party due diligence
- Screening and monitoring against sanctions and watchlists
- Fraud prevention and detection tools
- Confidential reporting (whistleblowing) channels
- Periodic risk assessments across business units
- Internal audits and independent assurance

Our control environment is regularly reviewed and enhanced to respond to emerging risks and regulatory developments.

Culture, Training and Awareness

A strong culture of integrity supports all aspects of Davies' financial crime approach. We ensure all employees receive mandatory, role-appropriate training on Anti Money Laundering & Counter Terrorists Financing, Anti Bribery & Corruption, Fraud Prevention, Sanctions, and Ethical Conduct. Additional enhanced compliance training is provided to higher-risk roles and leadership positions.

Third Party and Supply Chain Integrity

Davies expects suppliers, partners, and outsourced service providers to uphold equivalent standards in preventing financial crime. We apply risk-based due diligence, ongoing monitoring, and contractual requirements to ensure alignment with our policies and ethical expectations.

Queries and Escalations

Preventing and detecting financial crime is everyone's responsibility. Colleagues and relevant third parties must raise concerns promptly through Group Compliance, Divisional Compliance Teams or the Speak Up channel, in line with the Global Speak Up Policy.

Davies does not tolerate retaliation against anyone who raises a concern in good faith.

Continuous Improvement

Davies is committed to ongoing improvement in its financial crime defences. We monitor emerging risks, regulatory developments, and global best practices to ensure our framework remains effective, proportionate, and forward-looking. We invest in technology, data analytics, and specialist expertise to strengthen our resilience and protect our clients and markets from harm.



Document Control

Approval

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Approved By	James Heath, Group Chief Risk Officer

Document Review

This document is reviewed at least annually and may be updated at any time.

The latest version is available on the Intranet withing the Governance, Risk and Compliance Hub or from Group Compliance upon request.

Review, approval, and version history records are maintained within the Group Policy Management Platform and are available from Group Compliance on request.

