



**DINOSAUR MERCHANT BANK  
LIMITED**

**FINANCIAL CRIME POLICY  
STATEMENT**

## Introduction

The Board of Dinosaur Merchant Bank Limited (“DMBL”) recognise that financial crime in all its forms is a threat to DMBL and the financial services community.

DMBL is committed in the territories which it operates to the prevention of financial crime such as money laundering, the funding of terrorist activity, bribery and corruption, prevention of sanctions breaches, fraud and market abuse and through risk-based internal procedures, policies and systems and controls strives to ensure that high standards of crime prevention and awareness are maintained by all Directors, employees and consultants, whether under a contract of employment or a contract of service or otherwise.

## Our objectives

Through our financial crime policies and procedures, we aim to prevent, deter, detect and investigate all forms of financial crime.

## Anti-Money Laundering

DMBL’s anti-money laundering (AML) policy is designed to ensure that we comply with the requirements and obligations set out in the laws, regulations and industry standards of the United Kingdom (“UK”), European Union (“EU”), United States of America (“US”) and any other jurisdiction, in which we operate. This policy statement includes the appointment of a Money Laundering Reporting Officer (MLRO) who has responsibility for oversight of DMBL’s Financial Crime Compliance to ensure compliance with the relevant legislation, regulations, rules and industry guidance.

In order to protect our clients and DMBL from financial crime, robust standards of client due diligence are maintained, and it is understood that where verification of identity is required and cannot be completed, we may not be able to proceed with the relationship.

We will identify and confirm the identity of customers, including where applicable beneficial owners and Politically Exposed Persons (“PEPs”). DMBL has implemented enhanced due diligence and additional controls for high-risk clients, politically exposed persons or situations of increased risk clients.

DMBL is required to comply with two parallel regimes; legislative and regulatory. DMBL is a regulated entity and adheres to the Financial Conduct Authority AML regulatory standards.

As a UK registered company, DMBL is required to comply with both UK and EU legislation, which includes:

- The Proceeds of Crime Act 2002 (Part 7)
- The Terrorism Act 2000 (as amended by the Anti-Terrorism Crime and Security Act 2001)
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017



- The European Union Money Laundering Directive (4MLD)
- DMBL is in compliance with the anti-money laundering laws of the United Kingdom and of any other countries or jurisdictions that are applicable to it and will remain in compliance with all such laws.

DMBL has robust AML systems and controls, including risk rating methodology, KYC, screening, policy, procedures, risk assessments and the provision of regular briefings, training and development.

## Sanctions & Embargoes

Where sanctions or restrictions on activity with respect to targeted individuals, countries, governments or entities are imposed by the United Nations, EU, UK Treasury or Office of Foreign Assets Control (OFAC), for example, or individual countries we will comply with those sanctions. Should a client become a sanctioned party we will report to the appropriate authorities and freeze all accounts pending further instruction.

Staff are required to report any knowledge or suspicion of financial crime to the MLRO. Where appropriate these concerns are reported to the relevant law enforcement and/or regulatory authorities and we will also support law enforcement agencies to detect and confiscate criminal proceeds. DMBL will not transact directly or indirectly with someone, who is subject to sanctions or embargoes. i.e. assist Specifically Designated Nationals (SDN's).

DMBL will not transact directly or indirectly into an account located in a non-sanctioned country and the account holder or beneficiary is located in a sanctioned country.

DMBL will not facilitate the movement of funds and/or goods in relation to a transaction, involving a party who is subject to sanctions or embargoes.

DMBL will not facilitate a transaction denominated in USD, involving a party who is subject to sanctions or embargoes, as this violates US sanctions regulations. i.e. transaction involves US banking system.

DMBL has not and will not offer, payment, promise to pay, or authorisation of any payment or giving of money, or anything else of value, to any government official (PEP) or specifically designated national (SDN).

No part of any payments or proceeds from the sale of securities or bonds received by DMBL, directly or indirectly, as a result of a transaction will be used for any purpose which would cause a violation of the Sanctions laws of the United States of America, UK EU or any other applicable jurisdiction.

DMBL has robust sanctions and embargoes systems and controls, including screening, policy, procedures, risk assessments and the provision of regular briefings and training.

## Anti-bribery and Corruption

DMBL has a zero-tolerance approach towards bribery and corruption and will at all times operate fairly and transparently and act proportionately to comply with the UK Bribery Act 2010.



DMBL's Compliance Manual, Code of conduct and Employee Handbook endorse the zero-tolerance approach to bribery and corruption and set the standards to be applied to the conduct of DMBL's business.

Bribery and Corruption and unfair or anti-competitive practices have a negative effect on the workplace and DMBL takes pride in its ethical approach to doing business. We insist on integrity from our staff and expect the same from all those that we do business with.

Bribery may include the offering, promising, giving, accepting or soliciting of a financial or other advantage as an inducement or reward for an action which is illegal, improper or a breach of trust and DMBL has implemented procedures and controls to prevent bribery.

DMBL expressly prohibits staff from making facilitation payments. DMBL is committed to taking all reasonable steps to ensure that our stance is communicated to all our contractors, suppliers and intermediaries (contracting parties). DMBL expects all of its contracting parties to adopt a zero-tolerance policy to bribery and corrupt practices, in particular DMBL requires, under the terms of our legal agreements, that contracting parties shall at all times comply with all applicable laws, regulations and sanctions relating to anti-bribery, including, but not limited to the UK Bribery Act 2010 and the US Foreign and Corrupt Practices Act 1977.

DMBL is in compliance with all anti-bribery & corruption laws of the United Kingdom applicable to DMBL and the antibribery & corruption laws of any other countries or jurisdictions and will remain in compliance with all such laws.

DMBL has not taken and will not take any actions in the furtherance of an offer, payment, promise to pay, or authorisation of any payment or giving of money, or anything else of value, to any government official (PEP) including any officer or employee of a domestic or foreign government or government-controlled entity or of a public international organization, or any person acting in an official or representative capacity for or on behalf of any of the foregoing, or any political party or official thereof, or candidate for political office, or legislative, administrative or judicial officials whether or not elected or appointed, all of the foregoing being referred to as "Government Officials") or to any other person while knowing that all or some portion of money or value will be offered, given or promised to a Government Official for the purposes of obtaining or retaining business, an advantage in the conduct of business or securing any improper advantage.

DMBL has robust anti-bribery and corruption systems and controls, including a gifts and hospitality register, policy, procedures, risk assessments and the provision of regular training to combat bribery and corruption.

## **Anti-fraud**

DMBL is committed to preventing fraud from occurring and to developing an anti-fraud culture and has developed and maintains effective controls to prevent fraud, ensures that if a fraud occurs a prompt investigation takes place, takes appropriate disciplinary or legal action where justified, reviews systems and procedures to prevent similar frauds and records and reports all cases of fraud.

DMBL staff are required to have the highest standards of honesty and integrity in the exercise of their duties. DMBL will not tolerate fraud, impropriety or dishonesty and will investigate all instances of suspected fraud, impropriety or dishonest conduct by its staff or external organisations.

DMBL will take action, including dismissal and/or private prosecution, against any member of staff defrauding (or attempting to defraud) the firm, or other employees, clients or contractors (in relation to DMBL's business), including recovery of any lost funds.



DMBL will take action, including criminal prosecution, against external organisations or individuals defrauding, or attempting to defraud, the firm or its staff, clients or contractors in relation to DMBL's business.

## **Market abuse**

Market Abuse is a concept that encompasses unlawful behaviour in the financial markets and, for the purposes of this Regulation, it should be understood to consist of insider dealing, unlawful disclosure of inside information and market manipulation. Such behaviour prevents full and proper market transparency, which is a prerequisite for trading for all economic actors in integrated financial markets. Market Abuse is a generic term which covers a number of offences (both civil and criminal), where the common factor is the potential to profit or avoid a loss, by dishonest/unfair market practices, or the misuse of privileged information.

DMBL is committed to ensuring that all its employees and connected parties comply with the insider dealing and market abuse laws and regulations. Compliance with the law on insider dealing and market abuse forms a condition of contract for all employees and policy and guidelines have been set out in DMBL's Compliance Manual to ensure that employees and contractors do not deal securities, while having knowledge of inside information, or encourage others to deal. The policy also makes clear that insiders must not disclose inside information or engage in market manipulation.

**The Board of Directors  
Dinosaur Merchant Bank Limited**