

## Statement of Commitment-Criminal Finances Act 2017

### Our Values and Policies

Nanhua Financial (UK) Co Limited (NFC) maintains high standards when conducting its Business and complying with all applicable legislation. The Criminal Finances Act 2017 was introduced to prevent the facilitation of tax evasion. This statement sets out the measures taken by NFC to prevent it from being used for the purpose of facilitating tax evasion.

NFC adopts a risk- based approach to the prevention of tax evasion. NFC's Policies to prevent the facilitation of tax evasion include:

- KYC and Due- Diligence: where the client is based, links to any tax havens and high-risk jurisdictions
- Enhanced monitoring measures for high-risk clients that are linked to jurisdictions recognised as a tax haven
- Strict procedures around the transfer of client funds into client accounts using Standard Settlement Instructions and over Third- Party Payments and Receipts
- Use of external and internal tax specialists
- Not providing tax advice or making tax related referrals

All NFC employees are made aware of their obligations to report suspicions of tax evasion and are encouraged to raise any concerns under NFC's Whistleblowing Policy. All NFC's employees are provided with regular training so that they can identify risk factors and possible tax evasion.

In the event that you become aware of any circumstances that suggest that NFC and/or any other person for, with or through NFC conducts business may have engaged in tax evasion or have been used for that purpose ,please contact NFC's Compliance Officer, Julian Courtney, [julian.courtney@nhfinacial.co.uk](mailto:julian.courtney@nhfinacial.co.uk).

NFC reserves the right to terminate an employee, client or other business relationship should any instance of tax evasion occur. NFC is committed to fully co-operative relationship with all Regulators and will provide all required assistance where required.