

27th March 2025

## Phoenix Group Anti-Money Laundering and Sanctions Statement

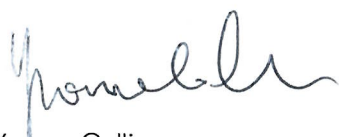
Phoenix Group Holdings PLC (Phoenix Group) is incorporated in the UK. The conduct of Phoenix's business is governed in accordance with the FATF requirements, and we apply processes aligned to UK legislation and regulations. Phoenix Group is committed to combating money laundering, terrorist and proliferation financing, bribery & corruption, tax evasion and other financial crimes, as well as complying with United Kingdom sanctions laws and regulations and for the jurisdictions in which Phoenix operates.

Phoenix Group maintains a Financial Crime Prevention Policy (The Policy) to ensure compliance with all legal and regulatory obligations and guidance. The Policy is reviewed annually and applies to all group companies including all regulated entities and Trustee Companies (see Appendix 1). The Policy includes, but is not limited to the following:

- Anti-Bribery, Corruption and Prevention of Facilitation of Tax Evasion controls in line with the Company's zero tolerance.
- Appointment of a Money Laundering Reporting Officer for each regulated business.
- Producing an annual MLRO report and risk assessment reviewing financial crime risks.
- Due diligence for all customers and parties Phoenix has a business relationship, in line with the UK Money Laundering Regulations and Joint Money Laundering Steering Group Guidance including:
  - Identification and verification, including beneficial owners and controlling parties, with on-going due diligence for the life of the relationship.
  - Sanctions screening prior to on boarding and on-going, using sanctions lists issued by the United Nations (UN), the European Union (EU), the United States (OFAC) and the United Kingdom (OFSI).
  - Politically Exposed Persons (PEPs) / Relatives and Close Associates (RCA) and Adverse media screening.
  - Process and controls identifying enhanced risks: Geographical, Industry, Product, Delivery channels and Customer including high value and PEP/RCA identification and applying enhanced due diligence.
  - Customer transactions monitoring for detecting, investigating, and reporting suspicious activity to the appropriate Financial Intelligence Unit.
  - Phoenix Group prohibits business with "Shell Banks" and "Shell companies".
  - Customer due diligence documentation is retained for a period of at least five years after the end of the business relationship. This is available for an appropriate request or as required by law.
- All employees including contracted /temporary staff are:
  - Identified and verified through appropriate documentation before establishing a business relationship and screened on an ongoing basis during employment.
  - Receive regular training on AML/CTF/PF, sanctions, anti-bribery, and corruption requirements.
- An annual financial crime assurance plan, providing Group assurance across the business. Where instances of non-compliance are identified, these are managed through a robust framework with remedial actions and tracked to completion.

We trust this statement along with the completed Wolfsberg questionnaire addresses any Financial Crime questions.

However, should you require any further assistance please contact us by email at [FinCrimeDD&RC@thephoenixgroup.com](mailto:FinCrimeDD&RC@thephoenixgroup.com).



Yvonne Collins

Head of Financial Crime Prevention – MLRO Phoenix Group

## Appendix 1

Phoenix Group Holdings PLC is listed on the London Stock Exchange and has no single shareholder with a shareholding over twenty-five percent of the total shares. All Group companies are wholly owned.

Parent Company	Company Registration Number	LEI	London Stock Exchange Reference
Phoenix Group Holdings PLC	11606773	2138001P49OLAEU33T68	PHNX

### Regulated Entities

Company Name	Company Registration	LEI	Regulators Reference
Phoenix Group Management Services Limited	3588063	2138005CNV9TY74WAR28	FRN 415029
Pearl Group Services Limited	5549998	213800KR6QUMTDIX5H91	FRN 571858
Phoenix Life Limited	01016269	213800F8BC7QS1SGPG53	FRN 110418
Phoenix Unit Trust Managers Limited	03588031	213800RUJKNJ1A9ZX173	FRN 651226
Phoenix Wealth Services Limited	02238458	213800PSSLEQR5IDJ351	FRN 465753
Namulas Pension Trustees Limited	00980864	2138009JDIENFDLD9M78	FRN 463426
ReAssure Limited	00754167	BQYCTFWOEM1JRDE6F109	FRN 110495
ReAssure Life Limited	01363932	5493005LF51QP7R4SS09	FRN 110462
ReAssure UK Services Limited	07860886	213800V2138XI4IYEZ47	FRN 571394
Standard Life International DAC	(ROI) 408507	MU1J7DTC8IC8VMFT8818	C39889
Standard Life Lifetime Mortgages Limited	SC193441	549300CCUJ1BP6N2ZJ02	FRN 310206
SunLife Limited	05460862	2138003PPIEA27377A59	FRN 769427
Phoenix Life CA Limited	00959082	549300NZ227BVL5W4E72	FRN110481

FRN References are regulated in the UK by the Financial Conduct Authority (FCA). "C" as a prefix are regulated in the Republic of Ireland.

### Corporate Trustee Companies

Company Name	Company Registration	LEI
G Trustees Limited	02030135	2138003URY7NYBK77767
NM Life Trustees Limited	01860464	2138009SCXYSOTLSXH75
Phoenix Pension Scheme (Trustees) Limited	01912908	213800KSY8FMU99DE175
Phoenix Pensions Trustee Services Limited	01967589	213800JTP4IW1CLE8Q08
Phoenix Wealth Trustee Services Limited	02155360	213800IHCXV68Y68RU96
ReAssure Pension Trustees Limited	01800078	2138008XWGP2LK6Z9532
ReAssure Trustees Limited	01767383	2138006XCBKUGVOLOT84
Scottish Mutual Pension Funds Investment Limited	SC061343	213800LFFJ5UNTAEZK9
Standard Life Trustee Company Limited	SC076046	213800BKB33U8U4K4M34

The companies registered addresses are as follows:

Phoenix: 1 Wythall Green Way, Wythall, Birmingham, B47 6WG

ReAssure: Windsor House, Telford Centre, Telford, Shropshire, TF3 4NB

Standard Life: Standard Life House, 30 Lothian Road, EH1 2DH

Phoenix Life CA: Matrix House, Basingstoke, Hampshire, RG21 4DZ

Standard Life based in ROI: 90 St. Stephens Green, Dublin, D02 F653