

# Sampo Group Guideline for Required Internal Procedures to Prevent Money Laundering and Terrorist Financing

Approved by Sampo plc Board of Directors on 5 August 2020



Approved by Sampo plc Board of Directors on 5 August 2020

## Scope of Application

This guideline applies to all Sampo Group companies.

# Sampo Group Guideline for Required Internal Procedures to Prevent Money Laundering and Terrorist Financing

## General

Facilitating the flows of illicit money can damage the integrity, stability and reputation of the Sampo Group. With a view to operative, juridical and image-damaging risks related to money laundering and terrorist financing and in order to meet the requirements of applicable legislation concerning the prevention of money laundering and terrorist financing, Sampo Group must have sufficient controls and procedures in place to prevent the use of group companies' services and/or products for money laundering and terrorist financing purposes.

## Key Normative Background

On 30 May 2018 the European Parliament and the Council of the European Union adopted directive (EU) 2018/843 amending directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, and amending Directives 2009/138/EC and 2013/36/EU (the "**AML Directive**"). The AML Directive lays the ground for all anti-money laundering activities as well as the prevention of terrorist financing within the EU. To certain extent the directive has also EEA relevance.

Directive 2015/849/EC has been implemented in all EU countries and the national implementation of the directive, as well as other relevant national norms, lays the basis for the prevention of money laundering and terrorist financing in all EU-countries, where Sampo Group companies operate. The deadline for implementing the amending directive (EU) 2018/843 in all EU countries was in January 2020.

- In **Finland**, the obligations and required measures for detection and prevention of money laundering and terrorist financing are based on
- (i) the "*Act on Detecting and Preventing Money Laundering and Terrorist Financing*" (444/2017, as amended from time to time), implementing on national level the AML Directive;
  - (ii) FIN-FSA Guideline on Preventing Money Laundering and Terrorist Financing 2.4, dnr. 2/101/2010, last updated 25 November 2015; and
  - (iii) "Best Practices for the Prevention of Money Laundering" issued by the Money Laundering Clearing House located at the National Bureau of Investigation (last updated 27 August 2012).

In **Sweden** the directive has been implemented through the “*Act on Prevention of Money Laundering and Terrorist Financing*” (2017:630). More detailed rules are set out in the Swedish FSA guideline FFFS 2017:11.

In **Norway**, the directive has been implemented through the “*Act relating to measures to combat money laundering and the financing of terrorism, etc.*” (Act 2018-06-01-23) and “*Regulation on measures to combat money laundering and the financing of terrorism*” (Regulation 2018-09-14-1324). More detailed rules are set out in the Norwegian FSA guideline 8/2019, dated 31 May 2019.

In **Denmark**, the directive has been implemented through “*Act on Measures to Prevent Money Laundering and Financing of Terrorism*” (Act no. 651 of 8 June 2017). The Danish FSA has further in October 2018 issued guidelines to the act.

All Baltic countries have also implemented Directive 2015/849/EC to their national legislation. In **Latvia** the “*Law on the Prevention of Laundering the Proceeds from Criminal Activity (Money Laundering) and of Terrorist Financing*” was passed 20.3.2018 In **Lithuania** the “*Law on the Prevention of Money Laundering and Terrorist Financing*” was passed on 29 June 2017 and in **Estonia** the “*Money Laundering and Terrorist Financing Prevention Act*” on 26 October 2017.

In **Luxembourg**, the directive has been implemented through the law of 13 February 2018 amending the law of 12 November 2004 on the fight against money laundering and terrorist financing, the law of 23 December 2016 introducing tax crime as a predicate offense and law of 13 January 2019 establishing the Register of Beneficial Owners.

The Danish and Swedish legislations do not apply to P&C insurance undertakings.

All relevant Sampo Group companies, must have internal guidelines and procedures in place to ensure compliance with local obligations regarding the prevention on money laundering and terrorist financing, as well as different sanctions regimes. The extent of such measures should be proportionate with and adapted to the risk concerned.

Internal guidelines shall also contain clear provisions regarding the applicable procedure for detecting and reporting suspicious transactions.

## Distribution of Responsibilities

The managing director of each company in Sampo Group has the ultimate responsibility to ensure that sufficient resources are allocated to the prevention of money laundering and terrorist financing.

Each group company may organize the duties and take other measures it deems necessary and appropriate, such as training of the employees, to be able to comply with the applicable local rules and various sanctions regimes from time to time imposed by the United Nations and/or the European Union.

The reporting of the anti-money laundering and terrorist financing activities and potential incidents must be organized in a manner which ensures that the management and the boards of directors of relevant companies receive all material information without undue delay and that Sampo plc’s compliance organization, who is responsible for organizing the reporting of relevant incidents to Sampo’s Audit Committee and Board of Directors, is reported on all relevant incidents in a timely manner.

Sampo plc’s compliance organization is also responsible for ensuring that the requirements of above mentioned sanctions regimes, to the extent applicable, are observed in Sampo plc’s investment and funding activities.

## Review and Update

This guideline is reviewed annually and always when deemed necessary due to

- (i) material changes concerning the subject issue in regulatory framework or operating environment; or
- (ii) changes within Sampo Group affecting the subject issue.

All updates and amendments to this guideline shall be approved by Sampo plc's Board of Directors.

Sampo plc's compliance organization is responsible for the review and update process.

## **Sampo plc**

Fabianinkatu 27  
00100 Helsinki, Finland

Phone +358 10 516 0100  
Business ID: 0142213-3

 [www.sampo.com](http://www.sampo.com)

 [@sampo\\_plc](https://twitter.com/sampo_plc)

 [@sampo\\_plc](https://www.instagram.com/sampo_plc)

 [sampo-plc](https://www.linkedin.com/company/sampo-plc)

**SAMPO**  **GROUP**