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

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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; and (ii) FIN-FSA Regulations and guidelines 2/2023 Preventing Money Laundering and Terrorist Financing, valid from 26 June 2023 until further notice.

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 4/2022, dated 15 November 2022.

In **Denmark**, the directive has been implemented through “*Act on Measures to Prevent Money Laundering and Financing of Terrorism*” (Act no. 316 of 11 March 2022). The Danish FSA has further in October 2018 issued guidelines to the act. The guidelines have been updated 3 November 2020.

All Baltic countries have also implemented Directive 2015/849/EC to their national legislation. In **Latvia** the “*Law on the Prevention of Laundering and Terrorism and Proliferation Financing*” was passed 17 July 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 the **United Kingdom**, the directive was implemented by The Money Laundering and Terrorist Financing (Amendment) Regulations 2019 (S.I. 2019/1511), which amended and extended The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (S.I. 2017/692) (‘MLRs’). The Financial Conduct Authority issued general guidance on the updated Money Laundering Regulations on 23 December 2019, and chapter 6.3 of the Senior management arrangements, Systems and Controls sourcebook of the FCA Handbook contains rules and guidance on money laundering risk. The FCA’s Financial Crime Guide provides guidance on how firms can reduce the risk of being used to further financial crime, including money laundering and terrorist financing.

The Baltic, Danish and Swedish legislations do not apply to P&C insurance undertakings, only to life insurance.

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

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

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

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