

Phoenix Group Anti-Money Laundering and Sanctions Statement

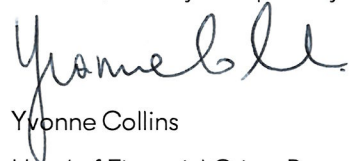
Phoenix Group Holdings PLC (Phoenix Group) is incorporated in the UK. The conduct of Phoenix's business is governed in accordance with the FATF requirements, and we apply processes aligned to UK legislation and regulations. Phoenix Group is committed to combating money laundering, terrorist and proliferation financing, 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 (see Appendix 1). The Policy includes, but is not limited to the following:

- 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.
 - Process and controls identifying enhanced risks: Geographical, Industry, Product, Delivery channels and Customer including high value and identification of Politically Exposed Persons (PEPs), their relatives and close associates (RCAs), and applying additional due diligence.
 - Processes to monitor customer transactions: detecting, investigating and as required reporting suspicious activity to the appropriate country FIU.
 - Sanctions screening and compliance: on-going screening against the sanctions lists issued by the United Nations (UN), the European Union (EU), the United Kingdom (OFSI) and the United States (OFAC).
 - Adverse media screening.
- Retention of customer due diligence documentation 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.
- Phoenix Group prohibits business with "Shell Banks" and "Shell companies".
- Anti-Bribery, Corruption and Prevention of Facilitation of Tax Evasion controls in line with the Company's zero tolerance.
- All employees are identified/verified through appropriate documentation before the establishment of a professional relationship and screened on an ongoing basis during employment.
- Regular training of employees on AML/CTF/PF, sanctions, anti-bribery, and corruption requirements.
- A dedicated financial crime assurance plan is in place, providing assurance across the Group throughout the year.
- Where any instances of non-compliance are identified, these are managed through a robust framework with remedial actions 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.



Yvonne Collins

Head of Financial Crime Prevention – MLRO Phoenix Group

Appendix 1

Phoenix Group Holdings PLC is listed on the London Stock Exchange FSTE 100 (PHNX) and has no single shareholder with a shareholding over twenty-five percent of the total shares. All group companies are wholly owned.

Regulated Entities

Company Name	Company Registration Number	LEI	Regulated Registration Number
Phoenix Group Holdings plc	11606773	2138001P49OLAEU33T68	PHNX
Phoenix Group Management Services	3588063	2138005CNV9TY74WAR28	FRN 415029
Pearl Group Services Limited	5549998	213800KR6QUMTDIX5H91	FRN 571858
Phoenix Life Limited	01016269	213800F8BC7QS1SGPG53	FRN 110418
Phoenix Life Assurance (Europe) DAC	(ROI) 684882	213800E7XPAE1UGSR105	C461038
Phoenix Life Assurance Limited	00001419	213800LHZHSXHFZ59970	FRN 117667
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	5493005L5F51QP7R4SS09	FRN 110462
ReAssure UK Services Limited	07860886	213800V2138XI4IYEZ47	FRN 571394
Standard Life Assurance Limited	SC286833	923M5RA211X3IO5NGM14	FRN 439567
Standard Life Pension Funds Limited	SC046447	RZJMLXIELM2LIX763187	FRN 110466
Standard Life International DAC	(ROI) 408507	MUIJ7DTC8IC8VMFT8818	C39889
Standard Life Lifetime Mortgages Limited	SC193441	549300CCUJ1BP6N2ZJ02	FRN 310206
SunLife Limited	05460862	2138003PPIEA27377A59	FRN 769427
Sun Life Assurance Company of Canada (UK) 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 Number	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	SC062343	213800LFFJ5UNTAEZK9
Standard Life Trustee Company Limited	SC076046	213800BKB33U8U4K4M34

The registered address for companies 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

Sun Life Assurance: Matrix House, Basingstoke, Hampshire, RG21 4DZ

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

Phoenix Life based in ROI: 25-28 North Wall Quay, D01 H104