



Statement of Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policies and Principles

Money laundering and terrorist financing have been identified as major threats to the Barclays Group and, indeed, the international financial services community. The United Kingdom, in common with many other countries, has passed legislation designed to prevent money laundering and to combat terrorism. This legislation, together with regulations, rules and industry guidance, forms the cornerstone of AML/CTF obligations for UK firms and outline the offences and penalties for failing to comply.

Tax evasion is a financial crime and a predicate offence to money laundering in the UK and in many other countries in which we operate. Barclays is committed to dealing only with clients who have appropriately declared their assets to the relevant tax authorities. We take a zero-tolerance approach to the facilitation of tax evasion in any country and have procedures in place to prevent it. We expect the same from our agents and third parties providing services for or on our behalf.

The requirements of EU/UK legislation apply to the Barclays Group globally. Group Companies may have additional local policies and procedures designed to comply with their local legislation, regulations and any government approved guidance in the jurisdiction(s) in which they operate. Barclays Bank PLC is authorised and regulated by the UK Financial Conduct Authority (FCA). Its registered number is 122702.

Barclays Bank PLC is listed on the London Stock Exchange and New York Stock Exchange. Further, some branches and subsidiaries are listed and/or regulated in their own right. Barclays Bank PLC is a member of the Wolfsberg Group (www.wolfsberg-principles.com), an association of eleven global banks that aims to develop financial services industry standards for Know Your Customer (KYC), AML and CTF.

Legal and Regulatory Framework

The principal requirements, obligations and penalties currently in force, on which Barclays Financial Crime Systems and Controls are based, are contained in:

- The Proceeds of Crime Act 2002 (POCA), as amended by the:
 - i. Serious Organised Crime and Police Act 2005 (SOCPA); and the
 - ii. Proceeds of Crime Act (Amendment) Regulations 2007;
- The Terrorism Act 2000, as amended by the:
 - i. The Anti-Terrorism, Crime & Security Act 2001; and the
 - ii. Terrorism Act (Amendment) Regulations 2007;
- The Terrorism Act 2006;
- The Bribery Act 2010;

- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, transposing the requirements of the EU's Fourth Money Laundering Directive;
- The FCA Handbook of Rules and Guidance, and in particular, the Senior Management Arrangements, Systems and Controls (SYSC) Sourcebook, which relates to the management and control of money laundering risk;
- The Joint Money Laundering Steering Group (JMLSG) Guidance for the UK Financial Sector on the prevention of money laundering/combating terrorist financing; and
- The Criminal Finances Act 2017.

Barclays Group Policies & Principles

Barclays Financial Crime function owns and is responsible for the following Group Policies covering:

1. Anti-Money Laundering/Counter-Terrorist Financing;
2. Sanctions;
3. Anti-Bribery & Anti-Corruption; and
4. Introducers.

These policies and principles are designed to ensure that all Group Companies complies with the legal and regulatory requirements applicable in the UK as well as with their local obligations.

1. Anti-Money Laundering (AML) Policy

The Barclays Group AML Policy is designed to ensure that all Group Companies comply with the requirements and obligations set out in UK and EU legislation, regulations, rules and industry guidance for the financial services sector, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime. The AML Policy sets out the minimum standards which must be complied with by all Barclays Group Companies and includes:

- The appointment of a Group Money Laundering Reporting Officer (GMLRO) and Business Unit Heads of Financial Crime of sufficient seniority, who have responsibility for oversight of Group and Business Unit compliance with relevant legislation, regulations, rules and industry guidance;
- Establishing and maintaining a Risk Based Approach towards assessing and managing the money laundering and terrorist financing risks to the Group;
- Establishing and maintaining risk-based customer due diligence, identification, verification and know your customer (KYC) procedures, including enhanced due diligence for those customers presenting higher risk, such as:
 - i. Politically Exposed Persons (PEPs);
 - ii. Countries identified by the European Commission as having strategic deficiencies in their national AML/CTF frameworks;
 - iii. Correspondent Banking relationships; and
 - iv. when providing tax advice or tax planning services to customers;
- Establishing and maintaining risk based systems and procedures to monitor ongoing customer activity;
- Procedures for reporting suspicious activity internally and to the relevant law enforcement authorities as appropriate;

- Maintenance of appropriate records for the minimum prescribed record-keeping periods;
- Training and awareness for all employees; and
- Provision of appropriate management information and reporting to senior management of the Group's compliance with the requirements.

2. Sanctions Policy

The Barclays Group Sanctions Policy is designed to ensure that Barclays comply with applicable sanctions laws in every jurisdiction in which it operates.

Barclays relies on a robust Global Sanctions Compliance Programme (“the Sanctions Programme”) to ensure adherence to applicable sanctions regulation throughout its subsidiaries and branches. The Sanctions Programme is underpinned by the Sanctions Policy and associated Sanctions Standard and all are designed to ensure Barclays and its employees know how to identify and manage the risks associated with sanctions, including the risk of Barclays products being used to contravene sanctions.

3. Anti-Bribery & Anti-Corruption Policy

Barclays has a zero tolerance policy towards bribery and corruption. Barclays recognises that bribery and corruption, including the facilitation of tax evasion, have an adverse effect on communities wherever they occur. If endemic, bribery and corruption can threaten laws, democratic processes and basic human freedoms, impoverishing states and distorting free trade and competition. Corruption is often associated with organised crime, money laundering and on occasions the financing of terrorism. In addition, the level and efficacy of investment and financing can be reduced, particularly within economically disadvantaged societies.

Barclays is committed to applying high standards of honesty and integrity consistently across our global operations, in all our business dealings, of all employees' and of any third party acting on Barclays behalf. We are subject to the provisions of the UK Bribery Act and the US Foreign Corrupt Practices Act, which have extra-territorial effect globally, as well as applicable local antibribery laws.

Barclays has no appetite for Barclays products or services to be used to facilitate bribery or corruption. Barclays has developed a robust anti-bribery and corruption control framework to manage the legal and regulatory risks faced.

4. Introducer Policy

As part of that framework, Barclays additionally has an Introducer Policy. The Policy covers the activities of third parties that generate or retain business, or secure a business benefit, for Barclays – collectively introducers. Potential examples would include senior advisors, lead generators and financial advisers. The Barclays Introducer Policy is designed to protect Barclays against bribery and corruption risk, facilitations of tax evasion risk, reputational risk, and wider operational and conduct risk associated with introducers. Barclays employees must apply the specific controls and procedures set out in the policy and accompanying standard.

All of Barclays financial crime Group Policies are supported and endorsed by the Barclays Board of Directors and apply to all Barclays' business dealings globally. All employees receive training on the financial crime Group Policies at least once a year, with more detailed and advanced training

for those whose roles involve heightened risks. Failure to comply with the policies may give rise to disciplinary action, up to and including dismissal.

Group Governance & Conformance

Regular reviews of the effectiveness of these Group Policies are carried out in addition to audits periodically undertaken by the Barclays Internal Audit function. This provides senior executive management oversight committees and the Board Audit Committee with the necessary assurance regarding the operating effectiveness of the Group's controls.