



Group Financial Crime Policy

Objectives

The policy sets out the framework and expectations by which the Group can mitigate the risks associated with fraud, bribery and corruption aligned to the requirements of:

The Hong Kong Insurance Authority group-wide supervision framework that requires the Group's Board to oversee the effectiveness of entity level measures to 'deter, prevent, detect, report and remedy fraud in insurance' across the Group.

The Hong Kong Prevention of Bribery Ordinance, the UK Bribery Act and the US Foreign Corrupt Practices Act, which require the Group to have in place 'adequate procedures' to prevent bribery.

Principles

Our counter fraud framework is developed to safeguards customers, meets regulatory expectations and reduce losses to an absolute minimum.

BU/LBUs are required to:

- Develop and implement a fraud risk management framework that consists of:
 - clear roles and responsibilities
 - risk-based training
 - appropriate internal controls which effectively prevent, detect and reduce fraud
 - fraud response plan
- Undertake an annual fraud risk assessment
- Report and escalate any suspicion of fraud to Group
- Rigorously investigate alleged fraud instances
- Provide its Board (or delegated authority) with an oversight of its fraud risk management framework including design and implementation

The Group forbids corruption and the paying or receipt of bribes for any purpose. The Group also prohibits facilitation payments and donations to political parties.

BU/LBUs are required to:

- Implement proportionate procedures to prevent bribery by associated persons
- Have top-level commitment in preventing bribery and fostering a culture in which bribery is never acceptable
- Ensure bribery prevention policies and procedures are embedded and understood throughout the organization through communication and training
- Have employees report and record relevant gift and hospitality
- Apply due diligence procedures in recruitment and third-party onboarding in a risk-based approach
- Conduct ABC risk assessments at least annually