



Governance

Financial Crime policy

December 2024

Financial Crime policy

1. What is this Policy for and what risks does it aim to reduce?

As a responsible business, we have an important role in society to deter, detect and report financial crime, including money laundering, and comply with legal obligations in relation to sanctions. The Financial Crime Policy ('the Policy') sets out how Landsec protects our business, our people and our clients and their customers from being victims of financial crime and what can be expected of us.

The best defence against involvement in financial crime including money laundering is to understand the transaction you are working on, know who the counterparties are, and understand the source of funds.

2. Our commitment

Landsec take proportionate steps to deter, detect, report and investigate any form of financial crime including:

- Money laundering- disguising the origins of illegally obtained money and applying a process by which the proceeds of crime are made to appear legitimate
- Fraud against us, our clients or their customers, including the corporate offence of failing to prevent fraud and other financial crimes
- Use of our businesses to launder the proceeds of crime or to finance terrorism
- The corporate offence of failing to prevent tax evasion
- Use of 'inside information' for personal or business gain or the illegal manipulation of the financial markets we operate in
- The undertaking of active or passive bribery or failures to prevent such activity of any associated parties in jurisdictions we operate
- Monitoring jurisdictions of origin as part of standard contractual terms
- Ensure tax is properly considered as set out in the [Landsec Tax Strategy](#) so we remain compliant with relevant tax laws.
- Operating in accordance with all application laws, regulations and sanctions restrictions.

3. What other Policies support it?

Policies associated with this Policy include:

- [Anti Bribery and Corruption and Ethical Business Policy](#)
- [Speak Up Policy](#)
- [Code of Conduct](#)
- [Group-Wide Share Dealing Policy](#)
- [Our Supply Chain Commitment](#)

4. What you should expect from us

We operate our business in a way that deters, detects, investigates and reports financial crime and to ensure we do not do business with individuals or entities which are subject to sanctions regimes. This includes:

- Undertaking extensive checks of our business relationships and those who work with us i.e. 'know your client' ('KYC') and in addition to these basic checks, viewing certain transactions as high risk including those involving unknown off-shore entities, any receipt not coming in via a UK clearing bank or any request to route payments through our systems.
- Ensuring inside information is protected and managed so it is controlled and limited to only those who need to know it through policies and procedures and a Disclosure Committee
- Investigation and acting against any individual or group perpetrating financial crime against us, our people or our clients
- Ensuring reasonable and appropriate fraud prevention procedures are in place
- Ensuring that the Board, ELT, senior leaders and wider workforce are aware of their responsibilities.

We work collaboratively with regulators and law enforcement agencies in relation to any related investigations and prosecutions. We reserve the right to search all company property and to review all data stored on our systems if there are reasonable suspicions of financial crime activity.

5. What we expect from you

- Demonstrate the commitments of this Policy and the requirements of the standards and procedures which support it.
- Complete all fraud, anti-money laundering or other financial crime training assigned to you.
- Immediately report suspicion of any financial crime being committed
- Not to inform or 'tip-off' anyone if you are suspicious they may be committing a financial crime, suspicious transactions or activity has been reported or you are aware an investigation is intended or underway.
- Not to deal in securities at any time if you are privy to inside information.
- To speak up in line with our [Speak Up Policy](#) which sets out the methods available to you. No action will be taken against you for reporting a genuine concern.

6. Breaches of the Policy and enforcement

There are potentially severe consequences for individuals and Landsec for failing to comply with this Policy. Financial crime and money laundering pose a reputational risk to Landsec and in some circumstances can lead to criminal liability of individuals involved. Landsec will investigate and will take any legal and/or disciplinary action as required.

7. Training and communication

Training on fraud and raising awareness of this policy will form part of the induction process for all new starters. We expect managers to ensure this Policy is promoted and applied in the relevant division or function you are responsible for.

Our approach to financial crime and anti-money laundering must be communicated to all third parties, suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate after that. As partners of the [Supply Chain Sustainability School](#) resources are provided to our suppliers on sustainability issues to help suppliers lead and embed change.

8. How do I report a suspicious transaction?

We expect our employees and contractors to speak openly and require them to report any concerns relating to themselves or others.

If you have any questions you can speak to your manager or one of:

- Head of Governance and Company Secretary
- Chief Financial Officer, Director of Group Finance or Group Financial Controller
- Head of Risk and Control
- Head of Legal

Should you wish to raise concerns anonymously or feel unable to talk to the people listed above, you should report the matter via the Speak Up line.

There will not be any adverse consequences for anyone who raises a concern as long as they have not knowingly made a false report.

9. Monitoring and review

Company Secretariat have overall responsibility for this Policy, to ensure that it complies with all legal and ethical obligations, as well as to monitor its use and effectiveness.

Management at all levels are responsible for ensuring that anyone who reports to them is made aware of and understands the Policy and is given adequate and regular training relating to fraud. Our internal systems and controls are regularly audited so that we can ensure they are effectively countering financial crime.

10. Version

This policy is owned by the Head of Governance and Company Secretary and approved by the Chief Executive on 18 December 2024.

Version #	Date	Author Title	Status	Changes
V0.1	02/08/2024	Corporate Secretariat	Draft	New policy

