

## **Topdanmark's approach toward Anti-Money Laundering and terrorist financing**

Topdanmark Livsforsikring (Life Insurance) has implemented throughout our company an Anti-Money Laundering (AML) policy and procedure framework designed to comply with the anti-money laundering laws and regulations, including sanctions regulations. This includes protection against terrorist financing.

This AML policy framework provides for:

An AML Officer of sufficient seniority who has the responsibility for compliance with relevant legislation, regulations, rules and industry guidance.

An overall risk assessment taking into account risk factors including those relating to customers, geographic areas, products, transactions and delivery channels assigning the money laundering and terrorist financing risks for the company. The risk assessment is reviewed on a regular basis.

Further, Topdanmark has a risk-based procedure for identification, verification and 'Know Your Customer (KYC) procedures, including enhanced due diligence for those customers presenting higher risk, and identification of beneficial owners.

### **Development in 2017**

In 2017, the following development took place:

- Categorization of all customers in the customer database was introduced relating to their risk of money laundering and terrorist financing
- Identification of Politically Exposed Persons was introduced
- Internal procedures for observing suspicious transactions were introduced.
- Further activities to ensure that the procedures are being complied with in practice were implemented

### **Training**

Topdanmark has implemented an e-learning program of risk-based AML training. The e-learning programme is mandatory for all employees at Topdanmark Livsforsikring and for employees in Topdanmark Forsikring handling life insurance products. In 2017, a total number of 600 employees passed the programme. Furthermore, classroom sessions are held for specific employees requiring further information and training.