

Statement of Commitment – Criminal Finances Act 2017

1. OUR VALUES AND POLICIES

Triland Metals Limited and its subsidiary offices overseas (“Triland”, “we”, “us”) hold high standards in conducting business with integrity, transparency and fairness, drawing on the confidence and trust earned from our clients worldwide. To do this, we put in place measures for the prevention of tax evasion in line with our zero tolerance approach to any form of criminal financing.

We further place our expectation on our partners, advisors, agents, customers, consultants and all stakeholders to adopt the same ethos against financial crime and we will not work with other organisations that do not share in this mind-set. We reserve the right to terminate an employee, customer or other business relationship if any instance of tax evasion should come to light.

Triland has a number of global policies relating to professional business conduct, including compliance with laws and regulations applicable to our industry. This includes policies which are designed to mitigate the risks of financial crime, including tax evasion.

2. DUE DILIGENCE AND RISK ASSESSMENT

Triland adopts a risk based approach towards the prevention of tax evasion. We identify areas of risk throughout the organisation and assess the measures in place to mitigate such risk, as well as implement any additional measures that may be warranted in light of such assessment.

We are regulated by the Financial Conduct Authority (FCA) and, where required, by regulatory bodies in each of the jurisdictions in which we operate. In light of our regulated status, as well as our existing policy and procedural frameworks, we have assessed that we are at low risk of facilitating tax evasion.

Nonetheless, our policies and procedures detail the risk based approach that has been adopted in identified risk areas. These include:

- ♦ **KYC and Due Diligence** to ensure there is full transparency as to where a client is based, discovering information about such client’s jurisdiction and that of key personnel and/or associated members of its group.
- ♦ **Risk Banding** to allocate resources for enhanced levels of discovery and monitoring appropriate for each counterparty.
- ♦ **Payments Monitoring** by following strict procedures regarding standard settlement instructions and pre-authorised personnel.
- ♦ Providing **No Tax Advice** and **No Tax Related Referrals**
- ♦ Recourse to **Tax Specialists**

3. TRAINING AND AWARENESS

We are committed to providing regular training to our personnel so that they are equipped to identify risk factors and indicators of possible tax evasion and other financial crime. There is an organisation-wide awareness of the implications for our business and the understanding on how to react appropriately.

Our employees are made aware of their obligations to report any suspicions pertaining to tax evasion and as per our existing whistleblowing policy we actively support employees in raising concerns if they believe that anything illegal or unethical is taking place.

4. COOPERATION

Triland maintains a transparent and fully cooperative relationship with our regulators and will provide assistance to our regulators in the event of any investigation concerning tax evasion. In the event that you become aware of any circumstances that suggest that we and/or any other person for, with or through whom we conduct business, may have engaged in tax evasion or have been used for that purpose, please contact our Head of Compliance: Compliance@triland.com | +44 (0)20 7061 5516.