

## TMK Zero Tolerance to Fraud, Bribery and Corruption Statement

This statement is made pursuant to the Economic Crime and Corporate Transparency Act 2023 (the ECCTA) and the UK Bribery Act 2010 (the Bribery Act) and constitutes the Zero Tolerance to Fraud, Bribery and Corruption Statement for Tokio Marine Underwriting Limited (TMUL), Tokio Marine Kiln Group Limited (TMKGL) and all relevant subsidiaries (TMK).

At TMK, we are fully committed to upholding the highest standards of integrity, transparency, and accountability in all aspects of our operations. In line with the ECCTA and the Bribery Act, we maintain a **zero-tolerance approach** to fraud, bribery, corruption, and all other forms of financial crime.

We recognise the serious impact that these financial crimes can have on our customers, stakeholders, and the wider financial system. As such, we have a robust and proportionate financial crime prevention procedures in place to ensure compliance with the ECCTA and the Bribery Act, including the new corporate offence of failure to prevent fraud.

Under the ECCTA legislation, TMK may be held criminally liable if an associated person (including an employee, agent, or service provider acting on our behalf) commits a fraud offence intending to benefit TMK or its clients, and where we have not taken reasonable steps to prevent such conduct. We expect all associated persons to support our efforts in maintaining a culture of integrity and compliance.

### Risk Mitigation

To mitigate this risk, we have several financial crime initiatives in place including:

- **Policies and Procedures:** we have established clear internal policies and procedures to detect, prevent, and respond to financial crime. These include our Financial Crime Framework and Policy, Whistleblowing Policy, Conflicts of Interest Policy, Code of Business Conduct & Ethics.
- **Third Party Oversight:** We set clear expectations of our associated persons and implement proportionate oversight.
- **Risk Assessments:** We conduct regular risk assessments across our operations to identify areas of vulnerability.
- **Training:** We provide targeted and mandatory training to our staff on financial crime awareness and reporting obligations.
- **Key Personnel:** Our Head of Compliance and Money Laundering Reporting Officer oversees our financial crime framework and is accountable to the various TMK Boards.
- **Reporting:** We have implemented secure reporting channels by fostering an open culture for whistleblowers and ensured protection against retaliation.

### Expectations

We expect all employees, contractors, business partners, suppliers, and third-party representatives working with us and/or on our behalf to:

- act with honesty and integrity at all times;
- never offer, give, solicit or accept bribes or improper payments;
- report any suspected fraudulent or corrupt activity immediately; and

- cooperate fully with investigations and compliance efforts.

Any breach will be treated as a serious disciplinary matter.

## Commitment

TMK, through its Board, partners and senior management, is committed to fostering a culture of compliance and ethical conduct and preventing financial crime. We will continue to review and enhance our financial crime measures in line with evolving legal and regulatory requirements.

## Fostering an Open Culture

TMK is committed to leading by example and fostering an open culture within the company in keeping with TMK's six corporate values so that all individuals feel empowered to raise with confidence any concerns relating to suspected misconduct or wrongdoing at an early stage and to challenge poor practice and behaviour.

## Governance

This Statement is reviewed on an annual basis by the Board, updated and re-published as appropriate.

## Approval

This Statement was approved by the TMKGL Board [and the TMUL Board] and is signed on their behalf by:

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Group Chief Executive Officer