

## **Kairos Investment Management Limited: Criminal Finance Act 2017 Statement**

Kairos Investment Management Limited ('KIML') has published this statement to articulate its policy against engaging in activities to assist investors/customers commit tax evasion. The statement is publicly available on our website in line with FCA Principle 5 (Communication).

KIML is committed to ensuring that its prevention policies and procedures are communicated, embedded and understood through the organization. We ensure that the facilitation and failure to prevent the facilitation of tax evasion is covered in our Policies and Procedures Manual (which is provided to all staff). Staff are reminded of the relevant requirements of the Criminal Finance Act 2017 at their compulsory Annual Compliance & Financial Crime Training. KIML also performs a periodic Criminal Finance Act Risk Assessment which is distributed to the Board.

KIML has a zero-tolerance financial crime policy (in terms of anti-corruption and anti-money laundering) which is backed by Senior Management and communicated at all levels within KIML. We expect all staff to demonstrate the highest standards of integrity at all times. Appropriate disciplinary action will be taken wherever tax evasion or the facilitation thereof by any personnel has been proven. Compliance with KIML policies, procedures and code of ethics is incorporated into employment contracts.

We perform due diligence on all associated persons/Companies to mitigate the risk of facilitation of tax evasion. Where appropriate, agreements with third parties are reviewed to check that they contain suitable provisions to enable termination of such agreements where associated persons/companies are not complying with the provisions of the Criminal Finances Act 2017.

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