

REGULATORY MATTERS

Sanctions policy

Miller takes both financial crime and legal barriers to business extremely seriously and strives to comply with sanction regimes to the fullest extent possible. While we have a comprehensive due diligence and sanctions policy in place, we do not provide this policy to third parties as it is for internal use only and it undergoes regular reviews and improvements as necessary. For your information, however, we are pleased to provide a summary of our internal policy as an indicative guide to our commitment to zero tolerance of financial crime and the efforts we make to ensure we comply with relevant sanctions:

1. Before we undertake business with any entity, we verify the identity of the entity based on information obtained from a reliable and independent source. We ensure that we understand the entity's corporate structure and ownership model. All business entities are included in this verification process which is undertaken centrally, including direct clients, any form of reinsureds, any insurance market, broker intermediaries, introducers, accounts payable and any third parties such as lawyers and loss adjuster appointed by markets.
2. We perform risk based analysis and on-going due diligence as necessary where we are involved in an occasional transaction with an entity or where we have any concerns with regard to the possibility of financial crime. Our rigorous due diligence process allows us to deal with entities and their associates knowing that there is no legal barrier such as government sanctions in doing so. We only do business with entities that comply with applicable sanctions.
3. We screen all entities against applicable sanctions regimes, which are the regimes relevant to each jurisdiction where we maintain an office: UK, EU, and Singapore. We are mindful, too, of sanctions imposed by OFAC in the United States.
4. We enforce a two stage screening process, which allows us to identify High Risk Entities. Where an entity is deemed to be high risk, it is referred to our Financial Crime Team for further investigation. This will include investigating whether or not the proposed entity, its business activities, the insurable interest or other interested parties pose a financial crime risk to Miller and that dealing with them is permitted under applicable sanctions regimes.
5. If the entity faces sanctions from HMT or within the EU, we will notify the appropriate agency. We will only consider accepting the entity if we receive approval to do so from the agency.
6. If the entity faces sanctions from OFAC but not HMT, we will consider whether it is appropriate to refer the matter to OFAC and whether to accept the entity. If an OFAC licence has not been obtained, then the policy and transaction must not be in US dollars or involve US nationals, US banks, US insurers or any other party who is subject to OFAC.
7. If the entity faces sanctions from any other relevant regime but not HMT, we will consider notifying the appropriate agency within that regime and whether to accept the entity. Again, the policy and the transaction must not be in the local currency and the local Miller office, its staff and any insurers must not be involved in the transaction in any way.
8. Final approval for undertaking business with a High Risk Entity must be obtained by Miller's Compliance Committee, which will make its decision based on a report setting out a summary of all the information collated and the outcome of any investigations.
9. Miller employees are trained to be conversant with financial crime issues and understand sanctions issues. Where employees' area of work includes a likely increased risk of dealing with potentially sanctioned entities, these employees receive additional training on sanctions regimes and enhanced due diligence.