Persimmon Plc

Anti-Money Laundering Policy Statement

Introduction

Persimmon Plc, and its group of companies which trade under the brand names Persimmon Homes, Charles Church and Westbury Partnerships ("the Group"), is one of the UK's leading housebuilders. The Board of Director's aim is for the Group to have a culture of, and reputation for, ethical conduct and compliance with the law.

The Group is committed to conducting business with integrity and to complying with all applicable anti-money laundering, anti-terrorist financing and financial sanctions legislation. As a leading UK housebuilder, we recognise our role in helping to prevent the misuse of the property market for criminal purposes and are committed to maintaining effective systems and controls to identify, assess and mitigate money laundering and terrorist financing risks.

Money laundering and terrorist financing

Money laundering is how criminals change money and other assets obtained through illegal activities into clean money or assets that have no obvious link to their criminal origins. Terrorist financing involves dealing with money or property (from legitimate or criminal sources) where there is reasonable cause to suspect that it may be used for terrorism. Both present serious risks to businesses and society.

Policy

We do not tolerate money laundering or terrorist financing. Led by the Board of Directors and the Executive Team, the Group has policies and processes to prevent money laundering and terrorist financing. The Board's aim is to ensure a robust and vigilant anti-money laundering and anti-terrorist financing culture.

Risk-Based Approach

The Group adopts a risk-based approach to the management of money laundering and terrorist financing risks. We regularly assess the nature and extent of the risks associated with our business activities and implement controls that are proportionate to those risks.

As a participant in the residential property sector, we recognise that property transactions can be attractive to those seeking to launder the proceeds of crime. Our controls are designed to identify higher-risk situations and to ensure that appropriate levels of scrutiny are applied.

Customer Due Diligence

The Group undertakes customer due diligence measures to verify customer identities, understand the nature of transactions and assess potential risks. These checks may include identity verification, screening against applicable sanctions and Politically Exposed Persons (PEP) databases, and obtaining information regarding the source of funds where appropriate.

Where circumstances present a higher level of risk, enhanced due diligence measures will be applied. These measures are intended to provide additional assurance that transactions are legitimate and compliant with applicable laws and regulations.

Monitoring and Reporting

The Group maintains procedures to identify and investigate unusual or suspicious activity. The Group's employees receive training to ensure they understand their responsibilities and can recognise indicators of money laundering and terrorist financing.

The Group has appointed a Money Laundering Reporting Officer (MLRO); the MLRO will make disclosures to the National Crime Agency (NCA) in circumstances where there is knowledge, suspicion or reason for suspicion that an individual or company is involved in any way with money laundering or terrorist financing.

Governance and Oversight

The Group has established governance arrangements to oversee compliance with anti-money laundering legislation, including the appointment of an MLRO with responsibility for overseeing the effectiveness of the Group's anti-money laundering framework.

The Group's policies, controls and procedures are subject to ongoing review and monitoring to ensure they remain effective, proportionate and aligned with legal and regulatory requirements. Independent assurance and internal audit activities support the continuous improvement of our controls.

Third Parties and Business Partners

We expect our business partners, professional advisers, agents and other third parties acting on our behalf to maintain appropriate standards of integrity and compliance with applicable anti-money laundering legislation. Where appropriate, we take steps to ensure that third parties engaged in property transactions maintain adequate anti-money laundering controls.

Record Keeping

The Group maintains records of customer due diligence and related anti-money laundering activities in accordance with applicable legal and regulatory requirements. Appropriate safeguards are applied to protect personal information and ensure compliance with data protection legislation.

Speaking Up

The Group promotes a culture where employees are empowered to speak up. Employees are required to raise concerns regarding suspected money laundering or terrorist financing and are supported in doing so through an established reporting channel.

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