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# Fraudfinder Ltd - Financial Crime Policy

**Version:** 1.0

**Last Review:** 1 May 026

**Approved by:** CEO

**Review Cycle:** Annual

## 1. Purpose and Scope

This Policy sets out Fraudfinder Ltd's ("Fraudfinder") zero-tolerance approach to financial crime. It addresses the three areas of greatest applicable risk: bribery and corruption, the facilitation of tax evasion, and money laundering and sanctions evasion.

The Policy applies to all directors, officers, employees, contractors, consultants, and any third party acting on behalf of Fraudfinder, in every jurisdiction in which we operate. It is binding on every business relationship entered into by the company.

Fraudfinder operates in the financial crime prevention sector. Our customers, predominantly regulated lenders and online gaming operators, depend on us as part of their own financial crime control framework. A failure on our part is therefore a failure twice over: in our own compliance obligations, and in the assurance our customers place in us.

## 2. Legal Framework

This Policy is designed to ensure compliance with the following UK legislation, as well as the equivalent regimes in any other jurisdiction in which we do business:

- Bribery Act 2010 (UK)
- Criminal Finances Act 2017 (UK), Part 3 (corporate offences of failing to prevent the facilitation of UK and foreign tax evasion)
- Proceeds of Crime Act 2002 (UK)
- Terrorism Act 2000 (UK)
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (UK)
- Sanctions and Anti-Money Laundering Act 2018 (UK), and applicable UK, EU, US (OFAC), and UN sanctions regimes

## 3. Anti-Bribery and Corruption (ABC)

Fraudfinder prohibits bribery and corruption in any form, whether involving public officials or private parties, and whether offered, promised, given, requested, agreed to receive, or accepted. This applies to direct conduct and to conduct via intermediaries, agents, distributors, partners, or any other third party acting on our behalf.

**Specifically prohibited:** the payment, offer, or acceptance of any bribe, kickback, secret commission, or improper inducement; facilitation payments of any size; political donations

made on behalf of the company; charitable donations made for the purpose of obtaining or retaining business or any other improper advantage.

**Gifts and hospitality:** permitted only where modest, infrequent, proportionate, transparent, and offered in the ordinary course of business. Cash and cash equivalents (including gift cards) are prohibited. Anything above £100 per item, or repeated to or from the same counterparty, must be pre-approved by the CEO and recorded in the gifts and hospitality register. Gifts or hospitality offered to or by public officials require prior written approval, regardless of value. See the Corporate Code of Conduct for full procedure.

**Third parties:** before engaging an agent, intermediary, distributor, or other third party who could give rise to bribery risk on our behalf, we conduct risk-based due diligence and obtain written contractual commitments to comply with this Policy and applicable anti-bribery laws. Right-to-audit and termination-for-breach clauses are included as standard.

**Books and records:** all transactions are accurately and transparently recorded in our books and records. No off-book accounts, undisclosed funds, or false invoices are permitted.

## 4. Anti-Facilitation of Tax Evasion

Fraudfinder has a zero-tolerance approach to the criminal facilitation of tax evasion, in line with the corporate offences set out in Part 3 of the Criminal Finances Act 2017. Neither Fraudfinder nor any "associated person" acting on its behalf will engage in or facilitate the criminal evasion of UK or foreign taxes.

Prohibited conduct includes (without limitation):

- Knowingly assisting a customer, supplier, employee, or other third party to evade tax.
- Failing to act on suspicions of tax evasion that come to our attention.
- Structuring transactions, contracts, or invoices in a way intended to facilitate tax evasion by another party.
- Accepting cash payments outside our ordinary banking channels.

We have undertaken a documented risk assessment of our exposure to the corporate offences and have implemented reasonable prevention procedures proportionate to our size, sector, and risk profile, including: due diligence on counterparties, contractual anti-tax-evasion clauses, training, and clear reporting channels (see section 7).

## 5. Anti-Money Laundering and Sanctions

Fraudfinder is not itself a regulated financial institution and does not handle client money. We nonetheless maintain controls proportionate to our role as a supplier of financial crime prevention services to regulated firms.

**Counterparty screening.** Customers, suppliers, and material counterparties are screened at onboarding, and on a risk-based ongoing basis, against applicable UK, EU, US (OFAC), and UN sanctions lists, politically exposed persons (PEP) lists, and adverse media. We do not enter into business relationships with sanctioned persons or entities, or in sanctioned jurisdictions.

**Customer due diligence.** We obtain and verify reasonable identifying information on corporate customers, including beneficial ownership where applicable, before entering into a contract. Heightened due diligence is applied to higher-risk customers, jurisdictions, and ownership structures.

**Suspicious activity.** Any colleague who suspects that funds, transactions, or counterparties are connected to money laundering, terrorist financing, or sanctions evasion must report this immediately to the CEO. Where appropriate, the company will submit a Suspicious Activity

Report (SAR) to the National Crime Agency. Tipping off the subject is a criminal offence and is prohibited.

**Cash.** Fraudfinder does not accept or make cash payments in the ordinary course of business.

## 6. Risk Assessment, Controls, and Training

The CEO is accountable for maintaining a financial crime risk assessment, reviewed at least annually, which informs the design of the controls set out in this Policy. Controls include counterparty screening, due diligence procedures, contractual protections, segregation of duties, and the gifts and hospitality register.

All directors, employees, and long-term contractors complete financial crime training on joining and at least annually thereafter. Training is risk-weighted, with deeper training for roles in finance, sales, procurement, and customer onboarding.

## 7. Reporting Concerns

Any colleague, contractor, customer, or supplier who suspects a breach of this Policy, or any actual or attempted bribery, tax evasion facilitation, money laundering, terrorist financing, or sanctions evasion, must report it without delay.

Reports may be made to line management, or directly to the CEO at alexander@fraudfinderai.com. Where the concern relates to the CEO, the report should be made to the Chair of the Board. Reports may be made anonymously and will be handled in confidence so far as the law and the integrity of any investigation permit. Disclosures are protected under the Public Interest Disclosure Act 1998. Retaliation, victimisation, or detrimental treatment of anyone who raises a concern in good faith is itself a serious breach of this Policy and the Corporate Code of Conduct.

## 8. Breach and Disciplinary Action

Breaches of this Policy will be investigated proportionately. Substantiated breaches may result in disciplinary action up to and including summary dismissal, termination of contractor or supplier arrangements, recovery of losses, and referral to regulators or law enforcement. Individuals may also commit personal criminal offences carrying significant fines and custodial sentences.

## 9. Governance, Review, and Acknowledgement

**Policy Owner.** Chief Executive Officer.

**Review.** Annually, or sooner if regulation, business circumstances, or stakeholder feedback require it.

**Acknowledgement.** All directors, employees, and long-term contractors are required to read and acknowledge this Policy on joining and on each material update. Acknowledgements are recorded by the company.

**Approved by.** The Board of Fraudfinder Ltd, May 2026.

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Alexander Shartsis, Chief Executive Officer

Fraudfinder Ltd

May 2026