

Hancock & Associates, Inc Sanctions Controls Policy

HANCOCK & ASSOCIATES, INC. SANCTIONS CONTROLS POLICY

Reviewed: 12/01/25

Next Review By: 12/01/26

SANCTION CONTROLS

It is necessary to ensure that we protect our underwriters and clients against financial penalties from trade or political sanctions. Sanctions are internationally agreed methods of bringing about change in another country's or individual's activities or policies that are deemed to breach international law, human rights or democracy.

We will ensure that no insured shall be provided with cover and no insurer or Underwriter has to pay any claim or provide any benefit or enhancement that would expose that insurer or Underwriter to any sanction, prohibition or restriction under United Nations resolutions or the trade or economic sanctions, laws or regulations of the United States of America, the European Union or the United Kingdom.

Hancock & Associates, Inc. makes checks of the various directories available to us both via Lloyd's, the industry in general and as provided by OFAC, UK and EU Sanctions check lists.

Clients / Insureds

As business emanates only from clients known to us and on whom we have undertaken our due diligence, the immediate risk of infringing sanctions is reduced. We undertake such checks that are appropriate and proportionate to the business we underwrite on behalf of Insurers.

Insurers

The majority of our business is placed with Lloyd's Underwriters in whom we have confidence and who are in compliance with all regulations. We will undertake checks that are appropriate and proportionate to the business.

Positive Match Procedure

In the event that the checking procedure produces a "match," we will notify the relevant authority and the appropriate leading Underwriter at Lloyd's. Staff will notify the Designated Person of any knowledge or suspicion of a sanctioned activity, who will be responsible for notifying the appropriate parties. All such matches will be logged and the log made available for inspection.

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Staff Vigilance

All principals and staff are aware of the necessity to remain vigilant. Staff are instructed to raise any concerns with senior management.

We will maintain up-to-date levels of education for all staff to maintain awareness of all aspects of sanction legislation.

Sanctions Lists to Be Checked

The lists that should be checked are:

- HM Treasury's consolidated list of asset freeze targets (UK/EU/UN sanctions)

<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets>

- OFAC's specially designated nationals list (SDN List)

<http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

OFAC Checks – Premium Bearing Changes

* Checking OFAC with ANY premium-bearing change to a policy.

Hancock performs an OFAC search as part of processing any premium changes to a policy.

OFAC Checks – Cancellation

** Checking OFAC at cancellation of policy.

Hancock also performs an OFAC search on all risks at time of cancellation for continued integrity and will report any suspicious findings to Underwriters.