S

1. Introduction

<<The Company>> is a U services that the Company relation to money launderi used (or potentially used) staff being exposed to mo money laundering policy w to all members of staff.

2. Scope of the Policy

The broad definition of r commit a money launderin temporary staff and contra

Our policy is to enable the a way which is proportion reasonable steps to minimi

All employees must be far with this Policy may lead to

3. What is Money Launderir

The principal primary legis consolidated, updated and supplemented by the Ter secondary legislation is th Funds (Information on th Laundering and Terrorist F

Money laundering can be through financial systems laundering offences includ property or removing it fro concerned in an arrangem retention, use or control (Section 328 POCA); and 329 POCA).

There are also several suspicion of money launde Д



olicy

oroviding <<outline goods and/or ss of the Company is [low] risk in orevent any of our services being ng activity, as well as any of our to put in place the following antiti-money laundering training given

ns that potentially anyone could all employees of the Company, all

al and regulatory requirements in nature of the business, by taking y laundering occurring.

nsibilities <<and failure to comply

of Crime Act 2002 (POCA), which with regard to money laundering, e Fraud Act 2006. The principal errorist Financing and Transfer of 017 as amended by the Money regulations 2019.

to move illegally acquired cash from a legitimate source. Money , converting, transferring criminal POCA); entering into or becoming suspect facilitates the acquisition, or on behalf of another person essing criminal property (Section

ilure to disclose knowledge or dering Reporting Officer (MLRO);

failure by the MLRO to dis National Crime Agency; a persons who are, or who such a way as to reduce investigation.

Any member of staff could if they suspect money lau and/or do nothing about it.

4. Money Laundering Repo

The Company will appoint activity and be responsibl The officer nominated to de

The Company will also a absence of the nominated

The MLRO will ensure that and existing <<employees and updated as required.

The MLRO will ensure that processes are incorporated

5. Suspicions of Money Lau

All <<employees/tempora practicable>> report any ki grounds to suspect) suspic in this policy document.

Once the matter has be staff/contractor>> must fo make any further enquiry ir

The <<employee/temporar person(s) whom they su commission of the offence others or note on the file results in the suspect beco

6. Consideration of the Disc

Once the MLRO has <<pre>comptly/timely>> mann

• There is actual or su:











bicion of money laundering to the somebody informs a person or involved in money laundering, in ing investigated or prejudicing an

the money laundering provisions, me involved with it in some way, any concerns should be raised.

closures about money laundering ring activity within the Company.

who will be responsible in the D is << >>.

nd awareness is provided to new tors>> and that this is reviewed

aundering systems and

nust <<immediately/as soon as of (or where there are reasonable) in the prescribed form as set out

.RO, the <<employee/temporary to <<hir>to <<hir>him/her>>

t NOT voice any suspicions to the ring, as this may result in the rust NOT discuss the matter with made to the MLRO in case this on.

it must be evaluated in a whether:

g taking place; or

- There are reasonable
- Whether the MLRO r National Crime Agen

Where the MLRO conclude laundering then consent w proceed.

Where consent is require transaction(s) in question given specific consent, or relevant time limits without

All disclosure reports refe retained by the MLRO in a <<5>> years.

The MLRO must also con relevant enforcement agen

7. Customer Identification a

Due diligence is performed including <<full name, [re [registration details ((corpo

Enhanced Due Diligence

It may be necessary for <<certain customers>> wh appears to be "high risk". verification of the custome situations may indicate a "h

- a new customer;
- a customer not well
- customers in knowr
- transactions that ar
- highly complex tran
- the transaction invo family member or a
- no face to face me expected; and
- <<other>>.







pect that this is the case; and pus Activity Report (SAR) with the

onable grounds to suspect money oing or imminent transaction(s) to

transaction to proceed, then the or completed until the NCA has ent through the expiration of the

reports made to the NCA will be r that purpose, for a minimum of

notifications and reports to other

ho must provide basic information ess, [date of birth (individuals)],

out enhanced due diligence on ransaction involving the customer a higher level of identification and e following non-exhaustive list of

or jurisdictions;

e unusual for that customer;

igements;

d person ("PEP") or an immediate P;

ne customer where this is usually

<< Employees/temporary s for each customer and if ye speak to the MLRO befor MLRO will be required to a

If enhanced due diligence

- obtain additional info owner(s);
- obtain additional ir relationship;
- obtain information or and customer's bene
- conduct enhanced m

This may include but is not lin

- checking the organi business address an
- attending the custom
- obtaining additional customer and its b beneficial ownership Companies House;
- in the case of a PEI the source of wealth
- ensure that the first name;
- <<other>>.

If satisfactory evidence of relationship or one-off tran filed with the MLRO who NCA.

8. **Ongoing Monitoring**

<< Employees/temporary intervals to ensure that th held on each customer is knowledge of the custome new people become involv to the MLRO.



assess the money laundering risk e diligence is required, you should gement with the customer. The of the business relationship.

must:

and on the customer's beneficial

ended nature of the business

source of wealth of the customer

relationship.

rm the identity of personnel, its

ess:

to establish the identity of the ding checking publicly available such as the registers available at

senior management and establish

bank account in the customer's

at the outset then the business d any further. A report should be bort needs to be submitted to the

ld review customers at regular omer information and information to date but is consistent with the r due diligence may be required if spicious activity must be reported

9. Data Protection

Customer details must be This data can be "proces prevent money laundering

10. Record Keeping

Customer identification ev customer must be retained relationship with that custo



with the Data Protection Act 2018. the Data Protection Act 2018 to

ny relevant transaction(s) for that ars from the end of any business

CONFIDENTIAL	S
Report to the Money Laundering	
Report of Money Laundering Ac	
To: Money Laundering Reportin	
From:	
[Insert name of employee]	
Title:	
Tel No:	
URGENT YES/NO	
Date by which response needed: _	
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Name(s) and address(s) of perse

[If a company, please include deta

Nature, value and timing of activ

[Please include full details e.g. w necessary]

Nature of suspicions regarding

[Please continue on a separate sh [Please attach any supporting doo

Has any investigation been und Yes / No



Continue on a separate sheet if

relevant]

re aware)?

If yes, please include details bel

[Delete as appropriate]

Have you discussed your suspice If yes, please specify below, exp YES/NO [Delete as appropriate]



ssion was necessary:

Please set out below any other i

Signed: _

Please do not discuss the c involved in the suspected n constitute a 'tipping off' offe imprisonment.

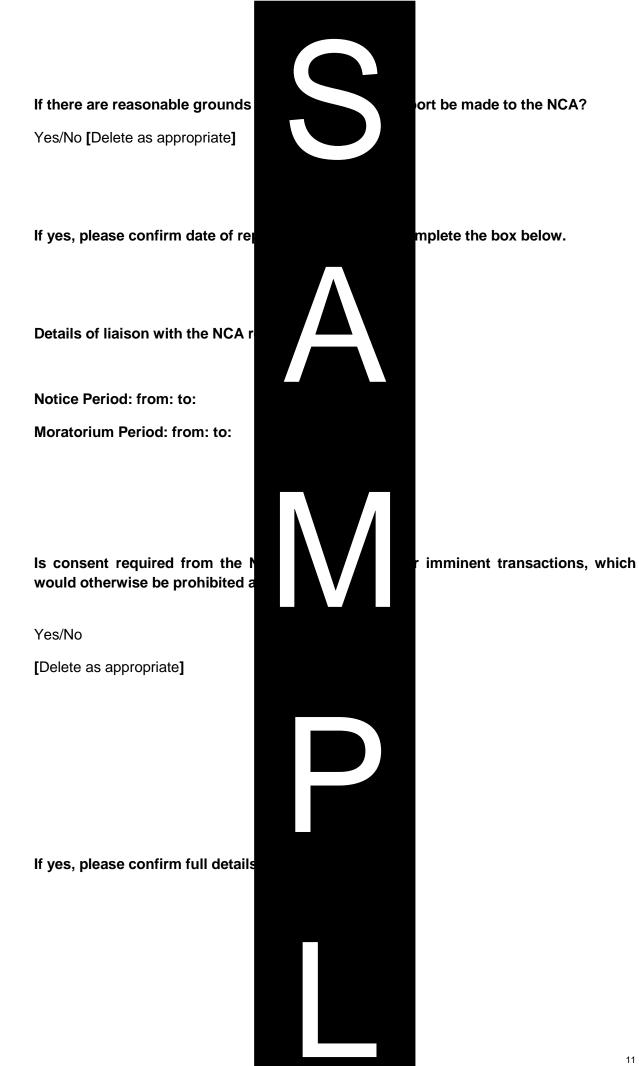


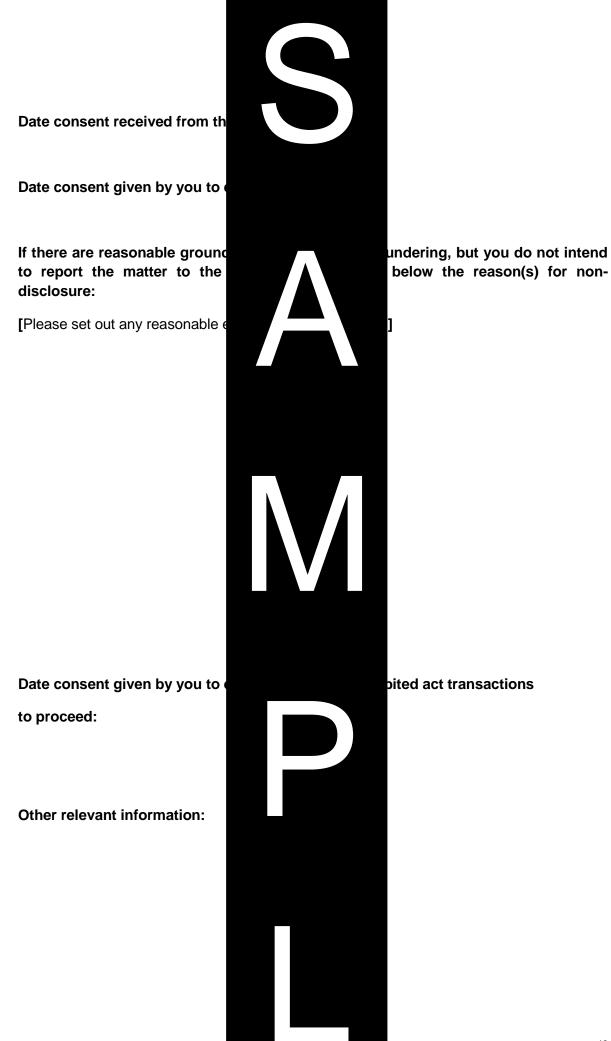
А

elevant:

vith anyone you believe to be vity described. To do so may maximum penalty of 5 years'

THE FOLLOWING PART OF THI ETED BY THE MLRO Date report received: Date receipt of from acknowledg CONSIDERATION OF DISCLOSU Action plan: OUTCOME OF CONSIDERATION Are there reasonable grounds for undering activity? © Simply-Docs - CO.CEP.04 - Anti-Money Launderin





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