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**Firm Wide Risk Assessment**

Estate agents are regulated by HMRC Money Laundering Regulations 2017 and the Proceeds of Crime Act 2002 (Amendment) Regulations 2018. The Organisation must have a risk assessment in place to identify the risks the business is exposed to from money laundering and terrorism financing.

The Organisation must comply with the Money Laundering Regulations 2017 and the Proceeds of Crime Act 2002 (Amendment) Regulations 2018 ('MLRs') which requires estate agents to have a risk assessment in place to identify the risks the business is exposed to from money laundering and terrorism financing.

This risk assessment was carried out by <<The Organisation>> Money Laundering and Terrorism Financing Risk Assessment Officer on <<insert date>>.

<<The Organisation>> has identified the risks the business is exposed to from money laundering and terrorism financing.

In preparing this Risk Assessment the following factors have been taken into account:

<<The Organisation>> has identified the risks the business is exposed to from money laundering and terrorism financing.

- 1. taken into account all guidance issued by HMRC;
- 2. taken into consideration any relevant national risk assessment, and any high risk third countries;
- 3. [<<The Organisation>> has a history of reports of suspicious activity];
- 4. [<<Other>>]

<<The Organisation>> has identified the risks the business is exposed to from money laundering and terrorism financing. The Organisation has identified the risks the business is exposed to from money laundering and terrorism financing. The Organisation has identified the risks the business is exposed to from money laundering and terrorism financing.

This assessment will be reviewed <<insert date>>.

<<The Organisation>> has identified the risks the business is exposed to from money laundering and terrorism financing.

.....  
[Signature of MLRO]

.....  
[Date]

- 1. <<The Organisation>> carries out Estate Agency Work as defined under Section 1 of the Estate Agents Act 1979 as work which includes introducing/negotiating with a view to buying or sell freehold or leasehold property including commercial property (whether in the UK or abroad) where this is done in the course of the business and pursuant to instructions from a customer.
- 2. Overall Risk Assessment: [HIGH] risk.  
[Add here a summary high risk for the Organisation].
- 3. <<The Organisation>> is exposed to the following risks from money laundering and terrorism financing:

<<The Organisation>> has identified the risks the business is exposed to from money laundering and terrorism financing. The Organisation has identified the risks the business is exposed to from money laundering and terrorism financing. The Organisation has identified the risks the business is exposed to from money laundering and terrorism financing.

**THE BELOW ARE EXAMPLES ONLY. YOU MUST TAILOR THIS TEMPLATE TO YOUR SPECIFIC PRACTICE.**

**DO NOT TAILOR THIS TEMPLATE TO YOUR SPECIFIC PRACTICE.**

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[Add here what steps the  
posed; for example, the ad  
there is a limit on the amou

in place to mitigate the risks  
MLRO and one other partner, if  
accepted from the customer].

**Politically Exposed Perso**

**[Risks:**

- PEPs or their fam  
due to their positio  
to be involved in br
- <<Other>>].

associates are seen as high risk  
and therefore they are more likely

This specific risk is judged  
why the risk is [low/mediu  
customers and instructions

] because <<state the reasons  
k carried out, the Organisation's

[Add here what steps the  
posed; for example, carryi  
approve new customers].

in place to mitigate the risks  
gence and getting the MLRO to

**Mortgage Fraud**

**[Risks:**

- Mortgage Fraud oc  
mortgage.
- Criminals may mis  
greater loan than th
- Organised crime sy  
and fail to make an
- <<Other>>].

de false information to obtain a

or property value to obtain a

properties, using false identities

This specific risk is judged  
why the risk is [low/mediu  
customers and instructions

] because <<state the reasons  
k carried out, the Organisation's

[Add here what steps the  
posed; for example, the id  
must be verified for those  
due diligence must be car  
party and its beneficial ow

in place to mitigate the risks  
party and its beneficial owners  
risk and if high-risk, enhanced  
d verification of the contracting  
off by the MLRO].

**Corporate Vehicles and T**

**[Risks:**

- Customers may us  
proceeds and to ev

companies to hide criminal

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**Geographical Areas of operation**

**[Risks:**

- *Customers may not be known or may come from high-risk jurisdictions or areas of corruption.*
- *It is not possible to meet customers face to face.*
- *Payments may need to be made through third parties from overseas accounts.*
- *<<Other>>].*

*Overseas sellers or buyers may be based in tax havens or have high levels of corruption.*

*Customers may not be known or may come from high-risk jurisdictions or areas of corruption.*

This specific risk is judged to be [low/medium/high] because<<state the reasons why the risk is [low/medium/high]>>. If carried out, the Organisation's customers and instructions received are [low/medium/high] risk.

because<<state the reasons why the risk is [low/medium/high]>>. If carried out, the Organisation's customers and instructions received are [low/medium/high] risk.

[Add here what steps the Organisation has in place to mitigate the risks posed; for example, what systems are in place for staff to identify high-risk third countries, how payments are made and what additional checks would need to be carried out.]

[Add here what steps the Organisation has in place to mitigate the risks posed; for example, what systems are in place for staff to identify high-risk third countries, how payments are made and what additional checks would need to be carried out.]

**[Other]**

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