

## 1. Introduction

<<The Organisation>> provides services to clients and is registered at HM Revenue and Customs (HMRC) for anti-money laundering supervision.

<<The Organisation>> is required to implement the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 to put in place appropriate policies, controls and procedures to prevent any of our services being used or potentially abused for money laundering activity, as well as any of our staff being exposed to money laundering or terrorist financing.

## 2. What is Money Laundering?

Money laundering can be defined as the process of moving illegally acquired cash through financial systems or other means to make it appear to be from a legitimate source. In the property sector this may involve a person who needs to purchase a property, and who uses companies and trusts, making it difficult to identify who the true owner is.

Terrorist financing is providing or collecting funds (legitimate or not) to be used to carry out an act of terrorism.

## 3. Money Laundering and Terrorist Financing Legislation

The principal pieces of UK legislation relating to anti-money laundering and counter-terrorist financing of terrorism are:

- Terrorism Act 2000
- Proceeds of Crime Act 2002
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 as amended by the Money Laundering Regulations 2019

### 3.1 Proceeds of Crime Act 2002

The Proceeds of Crime Act 2002 (POCA) consolidates, updates and reforms criminal law with regard to the proceeds of crime.

The Proceeds of Crime Act 2002 defines money laundering as:

1. concealing, disguising, converting, transferring or removing criminal property from the UK (Section 327)

<<outline further details>> and is registered at HM Revenue and Customs (HMRC) for anti-money laundering supervision.

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## Legislation

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2. entering into or becoming a party to an arrangement which you know, or suspect facilitates the use or control of criminal property by or on behalf of a person (Section 328 POCA);
3. and acquiring, using or disposing of criminal property (Section 329 POCA).

The primary offences carry a maximum of 14 years' imprisonment, unlimited fines or both.

#### The **secondary offences**

1. failing to disclose knowledge or suspicion of money laundering to the Money Laundering Reporting Officer (MLRO) (Section 330 POCA);
2. failure by the MLRO to report knowledge or suspicion of money laundering to the National Crime Agency (NCA) (Section 331 POCA); and
3. 'tipping off' whereby a person or persons who are, or who are suspected of being involved in money laundering, in such a way as to prejudice or are likely to prejudice an investigation or prejudicing an investigation. Tipping off includes disclosing information after a SAR (including an internal SAR to the MLRO) (Section 333A POCA); and
4. prejudicing the investigation by disclosing material (Section 334 POCA).

The secondary offences carry a maximum of five years' imprisonment, a fine or both.

You will only be guilty of a tipping off offence if you know that an investigation is being conducted.

### 3.2 **The Terrorism Act 2000**

The Terrorism Act 2000 sets out a range of offences to those contained in the POCA:

#### **Primary offences**

- Fundraising for the purposes of terrorism;
- Using or possessing terrorist property;
- Involvement in fundraising for terrorism;
- Money laundering of terrorist property or control of money that is destined for, or is the proceeds of, terrorism.

#### **Secondary offences**

- Failure to disclose information about terrorism
- Tipping-off offences

All offences carry heavy consequences. A member of staff could potentially be caught by the money laundering provisions if they suspect money laundering and/or

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ing are:

of money laundering to the Money Laundering Reporting Officer (MLRO) (Section 330 POCA);

or suspicion of money laundering to the National Crime Agency (NCA) (Section 331 POCA); and

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person interferes with relevant investigations.

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e that an SAR has been made or disclosed.

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s of terrorism;

on or control of money that is destined for, or is the proceeds of, terrorism.

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terrorist financing and either do nothing about it.

it in some way, and/or do nothing

### 3.3 Money Laundering Regulations

The Money Laundering Regulations 2019 and Terrorist Financing (Anti-Money Laundering) Regulations 2019 set out what agents must do to prevent their services being used for money laundering and terrorist financing by implementing a number of measures.

ended by The Money Laundering Regulations 2019 set out what agents must do to prevent their services being used for money laundering and terrorist financing by implementing a number of measures.

<<The Organisation>> is required to:

- Carry out a risk assessment of the risks of money laundering and terrorist financing in conducting customer due diligence;
- Adopt a procedure for the identification of suspicious activity;
- Maintain adequate records of transactions and business relationships;
- Ensure that all employees are aware of the money laundering risks and their duties under the Regulations.

ards anti-money laundering and terrorist financing. The Regulations require agents to identify suspicious activity; maintain adequate records of transactions and business relationships; and ensure that all employees are aware of the money laundering risks and their duties under the Regulations.

### 4. Scope of the Policy

The broad definition of money laundering is that it is the process by which a person commits a money laundering offence. <<The Organisation>>and temporary agents.

is that potentially anyone could commit a money laundering offence. <<The Organisation>>and temporary agents.

Whilst many agents may be involved in a transaction, both parties to a transaction may be funded. <<The Organisation>>to identify any suspicious activity.

money, agents have knowledge of the source of the money, the intermediaries and how the purchase of the property was funded. <<The Organisation>>as an important role at the outset.

This policy aims to ensure that all employees understand and comply with the money laundering legislation. All employees must be aware of the policy developed by <<The Organisation>>and effectively manage the risks of money laundering and terrorist financing.

<<The Organisation>>and all its employees must be aware of the policy set out in anti-money laundering legislation. All employees must be aware of the policy set out below which have been developed by <<The Organisation>>and effectively manage the risks of money laundering and terrorist financing.

Any breach of this policy may result in disciplinary action, and could result in criminal prosecution. Substantial financial damage to an employee or <<The Organisation>>.

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### 5. Money Laundering Reporting

<<The Organisation>>will be responsible for anti-money laundering activity within <<The Organisation>>.

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<<The Organisation>>will be responsible for anti-money laundering activity in the absence of the nominated person.

RO who will be responsible in the absence of the nominated person is <<The Organisation>>.

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The MLRO will ensure that

1. appropriate training <<employees/temporary staff>> and updated as required;
2. they keep up to date with relevant legislation and guidance from relevant bodies, such as the FCA;
3. appropriate anti-money laundering policies and procedures are incorporated by <<The Organisation>> and carried out, and <<The Organisation's>> policies and procedures shall be updated when required;
5. disclosures shall be provided to the MLRO and/or deputy MLRO if the MLRO reasonably suspect that money laundering has taken place;
6. [<<Other>>].

## 6. Suspicions of Money Laundering

There are a number of factors which may cause you to suspect that money laundering is taking place. Below is an exhaustive list of scenarios/points to consider:

1. [The customer is reluctant to provide information about their identity and source of funds;
2. The customer is reluctant to provide information about their identity and source of funds;
3. One party to the transaction is from a high-risk third country';
4. There is no apparent reason why the customer has chosen <<The Organisation>> over another company which would have been better placed to provide the service;
5. Complex company structure which make it difficult to identify the true owner;
6. One or more individuals involved in the transaction are from locations which are known for corruption;
7. Monies have been paid to the customer in a manner which does not appear to be connected with the customer;
8. Funds are being sent to a third party which is not the usual destination and/or to an unusual destination;
9. There are late changes to the transaction;
10. Customer asks to hold the funds in <<The Organisation's>>our account for no apparent reason;
11. The customer requests payment in cash or cleared funds up front;
12. The transaction is unusual in some way, or what the parties are hoping to achieve;
13. Funds are paid in part by cash;
14. Multiple payments are made to the customer;
15. There are unusual circumstances, such as the use of complex loans, mortgages from an unknown source;
16. <<Other>>]

provided to new and existing customers and that this is reviewed annually

relevant legislation and guidance from relevant bodies;

and processes are incorporated by

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investigated further if the MLRO reasonably suspect that money

ate, or which may cause you to suspect that money laundering is taking place. Below is an exhaustive list of scenarios/points to consider:

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customer has chosen <<The Organisation>> over another company which would have been better placed to

which make it difficult to identify the

positions and/or are from locations which are known for corruption;

does not appear to be connected

usual destination and/or to an

action;

organisation's>>our account for no

payment in cash or cleared funds

what the parties are hoping to

agency;

accounts;

example, use of complex loans,

All <<employees/temporary staff/contractors>> must report any knowledge of, or (suspect) suspicious activity to the MLRO in the prescribed form as set out in this policy document. Failure to do so could result in five years imprisonment.

Once the matter has been referred to the MLRO, the <<employee/temporary staff/contractors>> must follow the instructions of the MLRO and must NOT make any further enquiry into the matter or deal further with the transaction until you have consent from the MLRO.

The <<employee/temporary staff/contractors>> must NOT voice any suspicions to the person(s) whom they are dealing with, as this may result in the commission of the offence. They must NOT discuss the matter with others or note on the file. If the MLRO is made to the MLRO in case this results in the suspect becoming a money launderer.

## 7. Consideration of the Disclosure

Once the MLRO has received the report, they must evaluate it in a <<prompt/timely>> manner in order to determine if there are reasonable grounds to suspect money laundering.

- There is actual or suspected money laundering taking place; or
- There are reasonable grounds to suspect that this is the case; and
- Whether the MLRO must file a Suspicious Activity Report (SAR) with the National Crime Agency (NCA).

Where the MLRO concludes there are reasonable grounds to suspect money laundering then consent will be given for the transaction to proceed.

Where consent is required for the transaction(s) in question to proceed, then the MLRO must give specific consent, or withhold consent, within the relevant time limits without delay.

All reports referred to the MLRO must be retained by the MLRO in a confidential file for a minimum of <<5>> years from the date on which the transaction(s) in question are completed or the business relationship with the customer ends. No copies of the reports referred to the MLRO, or any other information, should be placed on a customer's file as the customer has the right to access their file.

[The MLRO must also consider any other relevant enforcement action taken by the NCA.]

## 8. Firm Wide Risk Assessment

must <<immediately/promptly>> report any knowledge of, or (suspect) suspicious activity to the MLRO in the prescribed form as set out in this policy document. Failure to do so could result in five years imprisonment.

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The <<employee/temporary staff/contractors>> must NOT voice any suspicions to the person(s) whom they are dealing with, as this may result in the commission of the offence. They must NOT discuss the matter with others or note on the file. If the MLRO is made to the MLRO in case this results in the suspect becoming a money launderer.

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[The MLRO must also consider any other relevant enforcement action taken by the NCA.]

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<<The Organisation>> has its exposure to money laundering and terrorist financing.<<The Organisation>> Firm Wide Risk Assessment is available separately.

<<The Organisation>> will conduct a Risk Assessment under regular review and any changes will be made.

The procedures set out in the Risk Assessment will be used to identify, measure and mitigate the risk of money laundering and terrorist financing. Where there is a higher risk of being exposed to money laundering, enhanced due diligence will be carried out.

*[If there are certain customer types that <<The Organisation>> is not willing to act for, or if there are certain identification requirements that are not allowed then these should be listed here].*

## 9. Customer Identity Check

## Form

All <<employees/temporary staff/contractors>> must assess the money laundering risk for each transaction and complete a Customer Identity Check and Risk Assessment Form at the start of each transaction and before the transaction completes. This will enable an appropriate level of customer due diligence to be carried out. The level of due diligence will be updated if the details of the transaction recorded on the form change.

*[Specify here if only the directors can deal with this with direct access to the system]*

*[Specify here if only the directors can deal with this with direct access to the system]*

## 10. Due Diligence

The identity of all customers, including the contracting party and <<employees/temporary staff/contractors>> should be identified and verified, along with the details of all the steps taken to identify the customers and any changes to the details. Customer Identification and Risk Assessments will be regularly reviewed and updated.

As well as identifying and verifying the identity of the contracting party and any <<employees/temporary staff/contractors>> it is important to understand the circumstances and the intended purpose of the transaction. The transaction should be monitored and reviewed throughout the transaction.

Listed below are the <<The Organisation>> diligence requirements in order to identify and verify individuals, listed companies, limited companies, offshore companies, personal representatives

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[If <<The Organisation>> has a verification programme, details should be provided here. The programme should be listed below.]

If an individual or organisation provides documents in a foreign language, these should be translated by a manager, accountant or other professional directory, as evidence of the individual's identity.

As part of the due diligence process, all <<employees/temporary staff/contractors>> should be checked by reference to a professional directory, as evidence of the individual's identity.

1. [Financial Sanctions List]
2. List of terrorist groups
3. List of countries categorised as high risk
4. List of third countries subject to international regimes;
5. <<Other>>.]<sup>1</sup>

If you cannot comply with the requirements, for example the individual is not willing to provide documents, the customer should be reported to the MLRO. <<[You should also file a report to the MLRO if a report needs to be submitted to the NCA]. >>

## 10.1 Seller

The identity of a seller must be verified before we can market their property. In order to 'identify' the seller, the customer must provide the following information at the outset of the transaction:

- Full name
- Date of Birth
- Residential Address

This information must be provided in the form of a copy of one document from List A and one from List B [attached to the contract]. The Organisation e.g. service provider.

### List A – Identity Documents

- [Current passport]
- Current photo card
- National Identity card

<sup>1</sup> You could add links to the relevant sites.

verification programme, details should be provided here. The programme should be listed below.]

and the documents required are in a foreign language, these should be translated by a lawyer, bank manager, accountant or other professional directory, as evidence of the purchaser's identity.

e, all <<employees/temporary staff/contractors>> should be checked by reference to a professional directory, as evidence of the individual and/or organisation's identity.

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2. List of terrorist groups
3. List of countries categorised as high risk
4. List of third countries subject to international regimes;
5. <<Other>>.]<sup>1</sup>

ence measures, for example the individual is not willing to provide documents, the customer should be reported to the MLRO. Other i.e. the individual is on the Organisation's specific due diligence requirements>>, you should also file a report to the MLRO. <<[You should also file a report to the MLRO if a report needs to be submitted to the NCA]. >>

before we can market their property. In order to 'identify' the seller, the customer must provide the following information at the outset of the transaction:

original of one document in List A and one from List B [attached to the contract]. The Organisation e.g. service provider.

- [Current passport]
- Current photo card
- National Identity card

- Firearms certificate
- Identity card issued for Northern Ireland
- <<Other>>]

#### **List B – Proof of Address**

*These documents must be* months

- [Current photo card issued as the identity document)
- Current year's council tax bill
- Benefits Entitlement Statement
- Most recent mortgage statement
- Bank or building society statement
- Utility bill (not mobile phone bill) months
- <<Other>>]

*[We also require one document from*

#### **List C – Proof of Ownership**

- Most recent mortgage statement
- Solicitor's letter confirming deeds/land registration]

### 10.2 **Purchasers**

Purchasers must also be identified before a business relationship is established. You must write to the purchaser and ask them either to bring in their identification documents (documents from List B) or a photocopy which has the original certificate signed by a professional person (a solicitor, chartered accountant, a bank or a notary public) independent from the purchaser. They must certify that the documents are genuine and the customer is who they say are.

<<List other procedures used by the Organisation e.g. service providers which carry out identification checks>>.

### 10.3 **Beneficial Owners**

Due diligence must also be carried out on beneficial owners who must be verified and identified. A beneficial owner is a person who is not listed as a customer, or a company or trust of which a customer is the principal agent, but who is acting on their behalf. If the customer is a company or trust, you must obtain evidence that the individual who is acting on their behalf has the authority to act for the company or trust and need to carry out customer due diligence on any person acting on their behalf as purchaser or purchaser.

In terms of corporate bodies, the beneficial owners of a company must also be identified. *[You should refer to the MLRO who must understand the legal structure of any such legal arrangement and must verify the beneficial owners].*



Once the structure of the company has been identified, the MLRO must be satisfied that the owner has been identified, verified by seeing a document from List A and one from List B.

10.4 If the customer is a listed company or a financial institution that is regulated by a public authority or a Financial Conduct Authority then these are deemed to be 'low risk' and no further suspicion money laundering checks are required. In this instance where all that is required is the dated page of the website of the existence of the authority for the evidence on the customer file.

10.5 If the customer is a limited company, the following documents must be obtained:

- Name, registered number and principal place of business.
- Certificate of incorporation
- Articles of Association
- Memorandum of Association
- Names of all directors
- Verify the membership of the company, or if none, its equivalent and the name of the secretary for the company.
- Individual identity of the beneficial owners (those who own 25% of the shares or voting rights in the company or control over the management of the company (this may be through a subsidiary company)).

If the customer is a holding company, you must repeat the above identification and verification for each subsidiary company. This applies for both limited companies and unincorporated companies.

You must look through the company's accounts to establish the ultimate beneficial owner.

*[For complex company structures, you must refer to the MLRO].*

*[In addition to the above, you must also check the Companies House, company website, and enquiries of the relevant authorities.]*

10.6 If the customer is an offshore company, the following documents must be obtained:

- Name, registered number and principal place of business.
- Names of the members of the company, or if none, its equivalent and the name of the secretary for the company.
- The memorandum of association
- Names of all directors
- Verify the membership of the company, or if none, its equivalent and the name of the secretary for the company.

Understood and the ultimate beneficial owner has been identified' by seeing a document from List A and one from List B).

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documents must be obtained:

and principal place of business.

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List A and one from List B) for all those who own 25% of the shares or voting rights in the company or control over the management of the company (this may be through a subsidiary company).

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of any companies or trusts to establish the ultimate beneficial owner.

*to the MLRO].*

*or Persons of Significant Control at Companies House, company website, and enquiries of the relevant authorities.]*

g documents must be obtained:

and principal place of business.

nt body, or if none, its equivalent and the name of the secretary for the company.

documents.

body, or if none, its equivalent and the name of the secretary for the company.

- Certificate of Incorporation
- Nominee director documents
- Individual identity of beneficial owners of company or otherwise controls the corporation

If the documents required  
certified by a lawyer, ba  
checked by reference to a

10.7 If the customer is acting  
obtained:

- Trust deed.
- List of trustees.
- List of beneficiaries
- Name of the settlor
- Individual identity of customer(s) (who may be the settlor, beneficiary or trustee(s))<sup>2</sup>.

10.8 If the customer is acting as a principal, the following documents are required:

- Grant of probate (if will)
- Letter of administration
- Individual identity of personal representative

# S

If an individual is a person or abroad, they are likely to be a PEP (but is not an exhaustive list) has been or is a member of parliament, members of supreme courts. Enhanced due diligence must be carried out on the PEP.

ent public function held in the UK and Person 'PEP'. This includes (but is not limited to) government, ministers, members of political parties and members of supreme courts (explained further below) will need to be carried out on the PEP and known close associates.

# A

You should make brief enquiries and can make these enquiries on internet websites <<Other>>]

customer is or may be a PEP. [You should check internet/government and parliament websites]

If you suspect they may be a PEP, check if:

check if:

- they have been a PEP (certainly in the last 12 months);
- they are immediate family of a PEP;
- they are known close associates of a PEP;

certainly in the last 12 months);  
P;

# M

You must get approval from the MLRO to agree to act for such a customer. You must establish the source of wealth and also conduct enhanced due diligence on the customer.

cepting a PEP as a customer. If we accept a PEP as a customer, we are required to take extra measures to ensure the funds which are involved. You must conduct enhanced due diligence on the business relationship.

## 12. Enhanced Due Diligence

# P

Enhanced due diligence is required where there is a greater risk of money laundering. Transactions which are 'high-risk' (which may include the following):

out where there appears to be a greater risk of money laundering, and the transaction appears to be 'high-risk' (which may include the following):

- [No face-to-face meeting with the customer];
- Instructions from a customer established in a high-risk third country;
- the transaction appears unusual for that customer;
- the transaction relates to high-value assets (usually within the top 5% of local market values);
- the transaction is complex;
- if the customer is a politically exposed person (PEP), an immediate family member or a known close associate of a PEP;
- Instructions from a customer established in a sanctioned country;
- <<Other>>].

the customer;  
is established in a high-risk third country;  
or an unusual request for that customer;  
property (usually within the top 5% of local market values);  
payment arrangements are overly complex;  
private banking;  
association;  
or is a politically exposed person (PEP), an immediate family member or a known close associate of a PEP;  
beneficial owner who is established in a sanctioned country;  
individual;

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If you suspect the transaction is high-risk, you should not continue to act for the customer. If enhanced due diligence is required, you should speak to the MLRO before continuing to act for the customer. If enhanced due diligence is required, the MLRO must:

should speak to the MLRO before continuing to act for the customer. If enhanced due diligence is required, the MLRO must:

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- [Obtain additional information on the customer and on the customer's beneficial owner;
- Obtain additional information on the extended nature of the business relationship;
- Obtain information on the assets and source of wealth of the customer and of the beneficial owner;
- Obtain information on the nature of the transaction;
- Conduct enhanced due diligence on the business relationship;
- Other].

This may include but is not limited to the following:

- [Checking the organisation's name, business address and telephone number to confirm the identity of personnel, its business address;
- Attending the customer's premises to establish the identity of the seller, purchaser or beneficiary;
- Obtain additional information on the senior management and source of funds;
- In the case of a bank account, ensure that the first name of the bank account in the customer's name;
- Require that the information provided by the manager, accountant or professional director are certified by a lawyer, bank or other institution that we can check by reference to a reliable source of the customer's identity;
- <<Other>>].

### 13. Training

It is a requirement of the ML Regulations 2017 that regular training for staff on anti-money laundering is undertaken and that a written record of the training is maintained.

Training is compulsory for all staff (including relevant existing staff will be trained at regular [two year] intervals (or more often if a change happens). The training will cover <<The Organisation's policy on anti-money laundering, guidance on how to identify suspicious transactions and how to report their suspicions to the MLRO>>.

Arrangements for training shall be recorded in the following manner: *training undertaken, how often it will be done and how this will be recorded (e.g. in the training log or received the training and when it was done)].*

<<The Organisation>> will ensure that all members of staff have received the training and that the training schedules must also be kept up to date.

### 14. Ongoing Monitoring

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All <<employees/temporary staff>> must review the transaction at regular intervals to ensure that the information is only accurate and up to date but that the transaction is consistent with the knowledge of the customer, and their own knowledge and audited by the MLRO also.

Further customer due diligence must be carried out if new people become involved in the transaction. If the customer is inadequate, the Customer Identity Check and the risk rating must also be updated if there are any changes to the transaction or any changes to the risk rating.

Any suspicious activity must be reported to the MLRO. Information that a suspicious activity is suspected and a suspicious activity report should never be placed on a customer file.

## 15. Record Keeping

The customer identification information for the relevant transaction(s) for that customer must be retained for a period of 5 years from the end of our business relationship with that customer or the date when that transaction was completed.

The MLRO will keep any documents associated with the transaction in a confidential file for a minimum of 5 years.

<<The Organisation>> will maintain a record of the:

- Firm Wide Risk Assessment
- Policies, Controls and Procedures
- Internal Audits.
- Written record of the training and awareness of money laundering and terrorist financing legislation

## 16. Data Protection

Customer details must be processed in accordance with the Data Protection Act 2018 and the UK GDPR (General Data Protection Regulations). This data can be "processed" as defined under the Data Protection Act 2018 to prevent money laundering and terrorist financing. The use of the data is allowed by other legislation or after getting the consent of the subject.

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**CONFIDENTIAL**

**Report to the Money Laundering**

**Report of Money Laundering Ac**

To: **Money Laundering Reportin**

From: \_\_\_\_\_

[Insert name of employee]

Title: \_\_\_\_\_

[Insert Title]

Tel No: \_\_\_\_\_

**URGENT YES/NO**

Date by which response needed: \_

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**Details of suspected offence:**

**Name(s) and address(s) of person(s):**

[If a company, please include details of directors and shareholders]

**Nature, value and timing of activity:**

[Please include full details e.g. dates, times, locations, etc. Continue on a separate sheet if necessary]

**Nature of suspicions regarding source of funds:**

[Please continue on a separate sheet if necessary]

[Please attach any supporting documents if relevant]

**Has any investigation been undertaken (by you or others)?**

Yes / No

**If yes, please include details below:**

[Delete as appropriate]

**Have you discussed your suspicions with the client?**

**If yes, please specify below, explaining why the discussion was necessary:**

**YES/NO [Delete as appropriate]**

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Please set out below any other information relevant:

Signed: \_\_\_\_\_

Please do not discuss the contents of this document with anyone you believe to be involved in the suspected matter or activity described. To do so may constitute a 'tipping off' offence with a maximum penalty of 5 years' imprisonment.

THE FOLLOWING PART OF THIS DOCUMENT IS REDACTED BY THE MLRO

**Date report received:**

**Date receipt of from acknowledgment**

**CONSIDERATION OF DISCLOSURE**

**Action plan:**

**OUTCOME OF CONSIDERATION**

**Are there reasonable grounds for suspecting underlying activity?**

**If there are reasonable grounds for suspecting underlying activity, should a report be made to the NCA?**

Yes/No[Delete as appropriate]

If yes, please confirm date of request and complete the box below.

Details of liaison with the NCA re

Notice Period: from: to:

Moratorium Period: from: to:

Is consent required from the NCA for imminent transactions, which would otherwise be prohibited as

Yes/No

[Delete as appropriate]

If yes, please confirm full details

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**Date consent received from the**

**Date consent given by you to**

**If there are reasonable grounds  
to report the matter to the  
disclosure:**

**[Please set out any reasonable**

**undering, but you do not intend  
below the reason(s) for non-**

**Date consent given by you to  
to proceed:**

**omitted act transactions**

**Other relevant information:**

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Signed: \_\_\_\_\_

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THIS REPORT TO BE RETAINED FOR \_\_\_\_\_ YEARS

The above document was given to \_\_\_\_\_, who has read and understood its contents and the actions required by him/herself with its contents should the need arise.

M

He/She has understood and acknowledged the contents of the company's anti money laundering policy document and has a thorough understanding of his/her responsibilities with regard to

Signed..... Director

P

Signed ..... Employee

Date .....

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