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1. Introduction

<<The Organisation>> pr
is registered at HM Rev
supervision.

rk <<outline further details>> and
(MRC) for anti-money laundering

<<The Organisation>>is r
and Transfer of Funds (In
appropriate policies, contro
being used or potentially u
our staff being exposed to

y Laundering, Terrorist Financing
Regulations 2017 to put in place
der to prevent any of our services
ndering activity, as well as any of
terrorist financing.

2. What is Money Laundering

ing?

Money laundering can be
through financial systems
property sector this may in
property can be purchased
identify who the true owner

s to move illegally acquired cash
e from a legitimate source. In the
needs to purchase a property, and
ies and trusts, making it difficult to

Terrorist financing is prov
carry out an act of terrorism

(legitimate or not) to be used to

3. Money Laundering and T

islation

The principal pieces of UK
financing of terrorism:

ti-money laundering and counter-

- Terrorism Act 2000
- Proceeds of Crime
- Money Laundering,
the Payer) Regulat
amended by the M
Regulations 2019

Transfer of Funds (Information on
Laundering Regulations 2017) as
Terrorist Financing (Amendment)

3.1 Proceeds of Crime Act 20

The Proceeds of Crime
criminal law with regard to

solidated, updated and reformed

The Proceeds of Crime Act
money laundering:

t the **primary offences** related to

1. concealing, disguis
it from the UK (Sec

ing criminal property or removing

2. entering into or being a party to an arrangement which you know, or suspect facilitates the use or control of criminal property by or on behalf of another 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 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);
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 reduce the likelihood of the person or persons being investigated or prejudicing an investigation, disclosing information that has been or is to be submitted after a SAR (including an internal SAR to the MLRO) (Section 333A POCA); and
4. prejudicing the investigation by disclosing information that is material (Section 333B 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 funds for the purposes of terrorism;
- Involvement in funds for the purposes of terrorism;
- Money laundering for the purposes of terrorism (money that is destined for, or is the proceeds of, terrorism).

Secondary offences

- Failure to disclose offences.
- Tipping-off offences.

All offences carry heavy consequences. Any member of staff could potentially be caught by the money laundering provisions.

arrangement which you know, or suspect facilitates the use or control of criminal property (Section 328 POCA);

property (Section 329 POCA).

14 years' imprisonment, unlimited

ing are:

f 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);

erson or persons who are, or who are suspected of being, involved in money laundering, in such a way as to reduce the likelihood of the person or persons being investigated or prejudicing an investigation, disclosing information that has been or is to be submitted after a SAR (including an internal SAR to the MLRO) (Section 333A POCA); and

erson interferes with relevant

ive years' imprisonment, a fine or

e that an SAR has been made or investigated.

of offences to those contained in

s of terrorism;

on or control of money that is

ember of staff could potentially be caught by the money laundering provisions.

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terrorist financing and either in some way, and/or do nothing about it.

it in some way, and/or do nothing

3.3 Money Laundering Regu

The Money Laundering R and Terrorist Financing (A to prevent their services b implementing a number of

ended by The Money Laundering 2019 set out what agents must do undering and terrorist financing by nts.

<<The Organisation>> is r

- a. Carry out a risk conducting custom
- b. Adopt a procedure
- c. Maintain adequate
- d. Ensure that all emp their duties under th

rds anti-money laundering and of suspicious activity; gular reviews; of the money laundering risks and above.

4. Scope of the Policy

The broad definition of r commit a money laundering Organisation>> and tempo

ns that potentially anyone could customers, employees of <<The

Whilst many agents may both parties to a transacti may be funded. <<The O to identify any suspicious a

money, agents have knowledge of intermediaries and how the purchase as an important role at the outset

This policy aims to ens understand and comply legislation. All employees r developed by <<The Orga money laundering and terr

sation>> and all its employees et out in anti-money laundering es set out below which have been nd effectively manage the risks of

Any breach of this policy action, and could result prosecution. Substantial employee or <<The Organ

, which may result in disciplinary ing personally liable to criminal urred and untold damage to an

5. Money Laundering Repor

<<The Organisation>> w laundering activity within < <<>>.

o be responsible for anti-money he officer nominated to do this is

<<The Organisation>> wil the absence of the nomina

MLRO who will be responsible in LRO is <<>>.

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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, systems and procedures are incorporated by <<The Organisation>>
4. internal audits and regular reviews of policies, systems and procedures are conducted 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>>].

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

relevant legislation and guidance from relevant bodies;

and processes are incorporated by

out, and <<The Organisation's>> reviewed when required;

investigated further if the MLRO reasonably suspect that money

6. Suspicions of Money Laundering

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There are a number of factors which may lead you to suspect that money laundering is taking place, or which may cause you to consider a transaction suspicious activity:

Below is an inexhaustive list of factors which may lead you to consider a transaction suspicious activity:

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 for the customer having chosen <<The Organisation>> over another provider 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 high risk 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 an unusual destination and/or to an unconnected third party;
9. There are late changes to the transaction;
10. Customer asks to hold the 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 to an unconnected third party;
14. Multiple payments are made to the account;
15. There are unusual circumstances, for example, use of complex loans, mortgages from an unconnected third party;
16. <<Other>>.]

their identity and source of funds;

high-risk third country';

customer has chosen <<The Organisation>> over another provider which would have been better placed to provide the service;

which make it difficult to identify the true owner;

positions and/or are from locations which are high risk for corruption;

does not appear to be connected with the customer;

unusual destination and/or to an unconnected third party;

action;

<<The Organisation's>> our account for no apparent reason;

payment in cash or cleared funds up front;

what the parties are hoping to achieve;

for example, use of complex loans, mortgages from an unconnected third party;

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All <<employees/temporary staff/contractors>> must report any knowledge of, or (suspect) suspicious activity in accordance with the prescribed policy document. Failure to report may result in imprisonment.

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

Once the matter has been reported 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 until you have consent from the MLRO to do so.

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The <<employee/temporary staff/contractors>> must NOT voice any suspicions to other staff/contractors, or the person(s) whom they are providing services to, or the commission of the offence, or to any other person, or note on the file or otherwise, unless you have made to the MLRO in case this results in the suspect becoming a money launderer.

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7. Consideration of the Disclosure

Once the MLRO has received a report, the MLRO must evaluate the report in a <<prompt/timely>> manner in order to determine whether there are reasonable grounds to suspect that a money laundering offence is taking place; or

Once the MLRO has received a report, the MLRO must evaluate the report in a <<prompt/timely>> manner in order to determine whether there are reasonable grounds to suspect that a money laundering offence is taking place; or

- 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).

- 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(s) to proceed.

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

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

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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, or the business relationship with the customer ends. No reports referred to the MLRO must be placed on the customer file as the customer file is a copy of their file.

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, or the business relationship with the customer ends. No reports referred to the MLRO must be placed on the customer file as the customer file is a copy of their file.

[The MLRO must also consider the implications of the report for relevant enforcement agencies.]

[The MLRO must also consider the implications of the report for relevant enforcement agencies.]

8. Firm Wide Risk Assessment

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

<<The Organisation>> Risk Assessment under regular

<<The Organisation>> will review and any changes will

be carried out.

The procedures set out in the money laundering and terrorist financing risk assessment and money laundering, enhanced

to manage and mitigate the risk of money laundering, a higher risk of being exposed to money laundering should 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].

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

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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 time the transaction is completed. This will enable an appropriate level of customer due diligence to be carried out on the transaction recorded on the form.

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[Specify here if only the directors can deal with this with directors only]

[Specify here if only the directors can deal with this with directors only]

10. Due Diligence

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The identity of all customers, contracting party and <<employees/temporary staff/contractors>> should be identified and verified, along with the beneficial owners. All <<employees/temporary staff/contractors>> should be kept up to date.

The identity of all customers, contracting party and <<employees/temporary staff/contractors>> should be identified and verified, along with the beneficial owners. All <<employees/temporary staff/contractors>> should be kept up to date.

As well as identifying and verifying the identity of the contracting party and any beneficial owners, it is important to understand the customer's circumstances and the intended purpose of the transaction. This should be monitored and reviewed throughout the ongoing obligation and should be kept up to date.

As well as identifying and verifying the identity of the contracting party and any beneficial owners, it is important to understand the customer's circumstances and the intended purpose of the transaction. This should be monitored and reviewed throughout the ongoing obligation and should be kept up to date.

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

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[If <<The Organisation>> should be provided here. programme should be listed

verification programme, details relating to the use of the online

If an individual or organisation a foreign language, these manager, accountant or professional directory. as e

and the documents required are in and certified by a lawyer, bank be checked by reference to a purchaser's identity.

As part of the due staff/contractors>> should against the following sanct

e, all <<employees/temporary an individual and/or organisation

1. [Financial Sanction
2. List of terrorist grou
3. List of countries ca
4. List of third countri regimes;
5. <<Other>>.]¹

ed under UK law; rd countries'; r laundering and terrorist financing

If you cannot comply with individual is not willing to sanctions list, the custom requirements>>, you should also file a report to the MLR to the NCA]. >>

ence measures, for example the Other i.e. the individual is on the organisation's specific due diligence ce from the MLRO. <<[You should r if a report needs to be submitted

10.1 Seller

The identity of a seller must property. In order to 'identifi information at the outset of

d before we can market their er must provide the following

- Full name
- Date of Birth
- Residential Address

This information must be and one from List B [a Organisation e.g. service p

original of one document in List A es which are applicable to the identity checks>>]:

List A – Identity Docume

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

¹ You could add links to the relevant sites

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

List B – Proof of Address

These documents must be dated within 3 months

- [Current photo card (if used 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) dated within 3 months
- <<Other>>]

[We also require one document from List A]

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 verify their identity by asking them to bring in their original identification documents (document from List B) or a photocopy which has the original certificate signed by a person (a solicitor, chartered accountant, a bank or a notary public) independent from the purchaser. They must certify that the person they are identifying is who they say they are.

<<List other procedures to 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 customer who is acting on their behalf. If the customer has the authority to act for the beneficial owner, you need to carry out customer due diligence on any person acting as a beneficial owner 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 corporate arrangement and must verify the beneficial owners].*

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

ent public function held in the UK and Person 'PEP'. This includes (but is not an exhaustive list) 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.

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You should make brief enquiries and can make these enquiries on various 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, you should check if:

check if:

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

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

pting a PEP as a customer. If we are required to take extra measures to manage the risks which are involved. You must conduct enhanced due diligence on the business relationship.

12. Enhanced Due Diligence

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Enhanced due diligence is required where there is a greater risk of money laundering, and the transaction appears to be '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 property (usually within the top 5% of local market values);
- the transaction is particularly complex;
- if the customer is a politically exposed person or an associate of a PEP;
- payment from third party or a politically exposed person or associate of a PEP;
- the seller or purchaser is a politically exposed person or associate of a PEP;
- Instructions from a customer established in a sanctioned country;
- <<Other>>].

- the customer is established in a high-risk third country;
- the transaction appears unusual for that customer;
- the transaction relates to high value property (usually within the top 5% of local market values);
- the transaction is particularly complex;
- if the customer is a politically exposed person or an associate of a PEP;
- payment from third party or a politically exposed person or associate of a PEP;
- the seller or purchaser is a politically exposed person or associate of a PEP;
- Instructions from a customer established in a sanctioned country;
- <<Other>>].

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If you suspect the transaction should be discontinued, you should speak to the MLRO before continuing to act for the customer. You should not approve the continuance of the business relationship. If you are advised that the transaction should be carried out, the MLRO must:

- [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 contact details;
- Attending the customer's premises;
- Obtain additional information on the seller, purchaser or beneficiary;
- In the case of a sale of assets, establish the source of the funds;
- Ensure that the first name of the customer is on a bank account in the customer's name;
- Require that the identity of the customer's manager, accountant or other professional director is certified by a lawyer, bank or other independent source that we can check by reference to a reliable source of the customer's identity;
- <<Other>>].

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13. Training

It is a requirement of the Money Laundering 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 relevant staff. Training for [relevant] existing staff will be trained at regular [two year] intervals (at change happens). The training will cover <<The Organisation's Policy on how to identify and report their suspicions to the MLRO>>].

Arrangements for training <<The Organisation's Policy on how often it will be done and how this will be recorded (including when it was done)>>].

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Money Laundering Regulations 2017 that regular training for staff on financing is undertaken and that a written record of the training is maintained.

relevant] existing staff will be trained at regular [two year] intervals (at change happens). The training will cover <<The Organisation's Policy on how to identify and report their suspicions to the MLRO>>].

Arrangements for training <<The Organisation's Policy on how often it will be done and how this will be recorded (including when it was done)>>].

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

record of the training provided, which must be kept up to date. Updated training schedules must also be kept up to date.

14. Ongoing Monitoring

All <<employees/temporary staff>> must review the transaction at regular intervals to ensure that the information is not only accurate and up to date but also that the transaction is consistent with the customer's profile and the nature of the business. All transactions will be reviewed and audited by the MLRO also.

All <<employees/temporary staff>> must review the transaction at regular intervals to ensure that the information is not only accurate and up to date but also that the transaction is consistent with the customer's profile and the nature of the business. All transactions will be reviewed and audited by the MLRO also.

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

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Any suspicious activity must be reported to the MLRO. Information that a suspicious activity is suspected and a report has been placed on a customer file.

Any suspicious activity must be reported to the MLRO. Information that a suspicious activity is suspected and a report has been 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 and the date when that transaction was completed.

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 and 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 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:

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

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

and staff awareness of money laundering and related data protection requirements

16. Data Protection

Customer details must be handled 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 where the use of the data is allowed by other legislation or after getting the consent of the subject.

Customer details must be handled 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 where 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]

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Nature, value and timing of activity:

[Please include full details e.g. value, date, location, etc. if necessary]

Continue on a separate sheet

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Nature of suspicions regarding the person(s):

[Please continue on a separate sheet if necessary]

[Please attach any supporting documents if relevant]

relevant]

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

(by you or others)?

Yes / No

If yes, please include details below:

[Delete as appropriate]

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Have you discussed your suspicion with the appropriate person?

If yes, please specify below, explain why a discussion was necessary:

Discussion was necessary:

YES/NO [Delete as appropriate]

Please set out below any other information relevant:

relevant:

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Signed: _____

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Please do not discuss the content of this document in the suspected money laundering investigation. To do so may constitute a 'tipping off' offence, which carries a maximum penalty of 5 years' imprisonment.

anyone you believe to be involved in the suspected money laundering investigation. To do so may constitute a 'tipping off' offence, which carries a maximum penalty of 5 years' imprisonment.

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THE FOLLOWING PART OF THIS DOCUMENT IS REDACTED BY THE MLRO

REDACTED BY THE MLRO

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Date report received:

Date receipt of from acknowledgment

CONSIDERATION OF DISCLOSURE

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Action plan:

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OUTCOME OF CONSIDERATION

Are there reasonable grounds for

underlying activity?

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If there are reasonable grounds

to be made to the NCA?

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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 en

If there are reasonable grounds
report the matter to the NCA, ple

[Please set out any reasonable ex

dering, but you do not intend to
reason(s) for non-disclosure:

Date consent given by you to en
to proceed:

ted act transactions

Other relevant information:

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Signed: _____

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THIS REPORT TO BE RETAINED _____ YEARS

The above document was given to _____ use him/herself with its contents and the actions required by him/herself should the need arise.

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He/She has understood and been made aware of the company's anti money laundering policy document through understanding of his/her responsibilities with regard to the same.

Signed..... Director

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Signed Employee

Date

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