

ANTI MONEY LAUNDERING POLICY

Our agency is subject to the Money Laundering Regulations 2017 which aims to counter money laundering and the financing of terrorism. We have a legal duty to obtain identification and proof of address from all our customers, who include homeowners seeking to sell their property, buyers, Landlords who wish to rent out their property and tenants. We're also obliged to ascertain whether other beneficial owners are involved on whose behalf the transaction or activity is taking place.

Our agency has adopted a risk sensitive approach throughout our business to recognise and prevent fraudulent transactions. We use a criteria-based system in order to assess the risk of money laundering.

HOW WE MANAGE THE RISK

Our agency invests heavily in training staff on Anti Money Laundering Legislation which is also covered in our induction course and reviewed on an annual basis to ensure that any potential new or amended legislation is adhered to. We have our own nominated Money Laundering Reporting Officer (MLRO) and Deputy Officer. It is the responsibility of the MLRO to receive and action reports of suspicious behaviour and activity and to complete and submit a Suspicious Activity Report (SAR) to the National Crime Agency when necessary. Our nominated officer is *Linus Jackson*, Director and our deputy officer is *Zoe Macdonald*, Director.

IDENTIFICATION PROCESS

In order to alleviate the risk of attempted money laundering through our company, we carry out Customer Due Diligence (CDD). All landlords, tenants, vendors and buyers must be identified fully by providing a photographic ID and proof of address or completing our third-party verification software Thirdfort. For Landlords and Sellers, we also require proof of ownership. All the original documents must be witnessed by a member of staff with a picture of ID taken and copies retained. In cases where seeing an original ID is not possible, copies can be certified by a solicitor or at the post office. Alternatively individuals can complete biometric passport and utility bill checks with Thirdfort. Verification checks must be completed on all individuals who have a vested interest in the transaction. For sending payments of rent, we will require the bank account to be in the customer's name. Subject to your individual circumstances, we may liaise with you for further/other documentation.

INDIVIDUAL IDENTITY DOCUMENTS

Our agency requires one document from List A and one from List B from all customers" Where applicable, please ensure that documents include full name(s), service addresses and account numbers and are not provided in the form of general correspondence.

List A – Identity Document

- Current signed Passport
- Current UK/EU photo Driving Licence
- Resident Permit issued to EU nationals by the Home Office
- Inland Revenue Tax notification
- State Pension or Benefits book/notification letter

List B – Proof of Address

- Current UK/EU photo Driving License, if not used in A
- Council tax bill
- Benefits entitlement letter

- Local authority rent card
- Tenancy agreement
- Bank statement
- Utility bill from the last three months
- Telephone bill excluding mobile pay as you
- Home or motor insurance certificate
- NHS medical card or letter from GP confirming registration
- Police registration certificate

List C – Proof of Ownership

- Most recent mortgage statement
- Home or motor insurance certificate
- Solicitors letter confirming house purchase/deeds/land registration

List C – Probate

If you are acting as a representative of an estate, we require the following:

- Grant of Probate (if a will was left)
- Letter of Administration (if no will left)
- Individual identity evidence from **List A & B** for the personal representative, either executor or administrator

Limited Company

If you are acting as a representative of a UK Company, we will also require the following:

- Certificate of Incorporation
- Articles of Association
- Memorandum of Association
- Latest Annual Return or Confirmation Statement, with details of current company officers
- If offshore, nominee director declaration and a general Power of Attorney
- Individual identity evidence from **List A and B** for all individuals or entities with 25% or more of the shares/ or voting rights in the company

Offshore Company

If you are acting as a representative of an Offshore Company, we will also require the following:

- Certificate of Incorporation
- Articles of Association, Memorandum of Association, Latest Annual Return with details of current company officers, Share Certificate(s) showing the Ultimate Beneficial Owner **OR**
- Certificate of Incumbency
- If the shares are owned by another company, repeat steps above for the holding company
- Nominee director declaration and/or general Power of Attorney (if applicable)
- Individual identity evidence from **List A and B** for all individuals or entities with 25% or more of the shares/ or voting rights in the company

Trust

If you are acting as a Representative of a Trust we require the following:

- Trust deed
- List of trustees
- List of beneficiaries
- Individual identity evidence from **List A & B** for all individuals with a vest interest in 25% or more of the capital and/or those who exercise control over the trust

SUSPICIOUS ACTIVITY REPORTING

At any given stage of a transaction, should we feel there are reasonable grounds on which to suspect that money laundering or terrorist financing is taking place, whether it be in relation to information received or any other aspect of the sale or let, we are legally obliged to report and submit a Suspicious Activity Report (SAR) to the National Crime Agency (NCA) at nationalcrimeagency.gov.uk.

Suspicious activity may include:

- A long-distance transaction, e.g. the buyer is purchasing a property from abroad but hasn't viewed the property.
- A transaction or valuation request for a property that is well below the market value
- Reluctance to provide information to confirm one's identity
- Delaying the signing of contracts or providing copies of ID
- Requesting that we hold cash in the client deposit account
- Settlements being offered in cash
- Intermediaries used to hide the identification of the buyer
- Funds being sent overseas to a third party
- No apparent reason for using our agency
- Late changes to the parties involved in a sale/purchase
- Significant improvement in one's financial position
- A reluctance to demonstrate source of funds

ADDITIONAL PEP & ADVERSE MEDIA CHECKS

We will check against the HM Treasury consolidating sanctions list to determine those who may be a politically exposed person (PEP), also carrying out adverse media (negative news) screening via searching the public information domain, where news items, publications, and other print or electronic records exist i.e. completing a google search and to document the assessment and the rationale behind any decisions made, ensuring news is from a reputable source.

RECORDS RETENTION

In relation to record keeping and the data stored for all customers, this will be reviewed regularly by our data controller who will determine whether there is a continued requirement for the business to hold such information. To work in compliance with the regulations, we shall keep records and supporting records on file for the current tax year plus five years following the date of the most recent transaction with our company.