

Form Title: Anti-Money Laundering Policy
Form Ref: POL 025
Author: PRB Consulting
Date: June 2025
Version: V1.0



Anti-Money Laundering Policy Statement

Introduction

This Anti-Money Laundering (AML) Policy reflects our organisation's commitment to comply with the Proceeds of Crime Act 2002, the Terrorism Act 2000, and the Money Laundering, Terrorist Financing, and Transfer of Funds Regulations 2017 (MLR 2017), along with subsequent amendments. It aims to ensure that all activities and transactions are conducted in compliance with the law to prevent the misuse of the Company's resources for money laundering or terrorist financing.

Scope of the Policy

This policy applies to all employees, contractors, and business partners involved in the Company's operations. It covers all financial transactions, customer engagements, and activities where there is a risk of money laundering or terrorist financing.

Definition of Money Laundering

Money laundering is the process of disguising the origins of illegally obtained money, typically by passing it through a complex sequence of banking transfers or commercial transactions. The aim is to make the 'dirty' money appear legitimate. This policy also addresses activities linked to terrorist financing.

Responsibilities

All employees are responsible for reporting suspicions of money laundering to the Money Laundering Reporting Officer (MLRO). The MLRO is responsible for evaluating such reports, taking necessary action, and liaising with the National Crime Agency (NCA). Employees must not disclose (or 'tip off') any suspicions to the person(s) involved.

Customer Due Diligence (CDD)

The Company will carry out customer due diligence (CDD) measures, including:

- Verifying the identity of clients and beneficial owners.
- Understanding the purpose of business relationships and transactions.
- Conducting Enhanced Due Diligence (EDD) in high-risk scenarios, such as dealing with Politically Exposed Persons (PEPs).

Training and Awareness

All relevant employees will undergo mandatory annual training on AML regulations, identifying suspicious activity, and reporting procedures. Records of completed training will be maintained.

Record-Keeping and Confidentiality

The Company will retain AML-related records, including CDD documentation and internal reports to the MLRO, for a minimum of five years. All records will be securely stored to ensure confidentiality and compliance with data protection laws.

Monitoring and Review

The MLRO will regularly review the effectiveness of the Company's AML procedures and make improvements as needed. This policy will be reviewed annually or when legislative changes occur.

Non-Compliance

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment. Additionally, individuals may face legal penalties under UK AML laws.

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Approval and Review

This policy is approved by the Board of Directors and will be reviewed annually or as required. The latest review ensures alignment with the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, and the UK's obligations under Financial Action Task Force (FATF) standards.

Signed: *David McElough*

Role: Director

Date: June 2025