

# **Anti-Money Laundering and Counter-Terrorist Financing Policy**

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## **1. Introduction**

Ashington Page is committed to ensuring that it has adequate controls to counter money laundering activities and terrorist financing activities, in line with a number of pieces of legislation relating to the prevention of financial crimes. The purpose of this Policy is to set out the standards and controls required to ensure that the firm complies with the relevant legislation, and that all employees are aware of their own responsibilities and duties to comply.

## **2. Responsibilities of the Board**

The Board has ultimate responsibility for ensuring that the firm has adequate arrangements in place to prevent it being used for the purposes of money laundering or terrorist financing. The Board must:

- Ensure that the money laundering risks to the business have been identified and documented;
- Ensure that risk-based controls and procedures are developed to allow the company to effectively manage its money laundering risks;
- Ensure that controls and procedures enable the identification of high-risk customers such as Politically Exposed Persons (PEPs) or those subject to Sanctions;
- Oversee the effectiveness of the anti-money laundering/counter-terrorist financing systems and controls;
- Ensure systems are in place so that all notifiable money laundering/terrorist financing related matters are reported to the relevant law enforcement agencies; and
- Ensure that all staff receive adequate training (including refresher training at least annually) on the risks and their responsibilities in relation to money laundering and terrorist financing.
- Appoint a Money Laundering Reporting Officer (MLRO)
- Register annually with HMRC, the current registration is effective from 31<sup>st</sup> January 2023

## **3. Responsibilities of the MLRO**

The MLRO is appointed by the Board and must take responsibility for:

- Ensuring that the firm's risk assessment, controls and procedures are reviewed regularly and remain up to date and fit for purpose;
- Receiving and recording any internally raised Suspicious Activity Reports (SARs), determining whether the suspicion warrants a report to the National Crime Agency (NCA) and filing any such reports;
- Considering whether it is necessary to obtain consent from the NCA before proceeding with a transaction and/or entering into a business arrangement where a suspicion has been raised;
- Maintaining a system for keeping copies of customer due diligence and supporting records; and
- Reviewing any high-risk customers to determine the level of enhanced due diligence which may need to be applied, and to decide whether a business relationship may be established/progressed

The name and contact details of the MLRO and if applicable their deputy must be made available to all staff and the MLRO must ensure that staff are adequately trained to identify and report suspicious activity and the procedures to avoiding "tipping off"

The MLRO for Ashington Page is:

**Name: Gareth Ashington**

**Title: Managing Director**

**Contact Address/Branch: 4 Burkes Parade, Beaconsfield, Bucks, HP9 1NN**

**Telephone Number: 01494 680018**

**Email Address: gareth@ashingtonpage.co.uk**

In the absence of the MLRO, the Deputy Nominated Officer is:

**Name: Angela Robinson**

**Title: Director**

**Contact Address/Branch: 4 Burkes Parade, Beaconsfield, Bucks. HP9 1NN**

**Telephone Number: 01494 680018**

**Email Address: angela@ashingtonpage.co.uk**

#### **4. Responsibilities of all employees**

All employees, whether permanent or temporary, have responsibility for ensuring that they are familiar with this policy, and that they comply with the processes set out herein. Each employee must take all measures necessary to ensure that neither they nor the company becomes involved in an illegal act, and that they report any suspicious activity that they may come across during the course of their business.

Under no circumstances should any member of staff disclose any concerns they may have to the client. Suspicious activity should be reported directly to the MLRO who will decide whether to raise a SAR.

#### **5. Record Keeping**

The following records must in all cases be maintained for a period of 5 years after the end of the business relationship:

- a copy of the customer contract and of the purchase or sale;
- copies of the evidence obtained to satisfy CDD
- a copy of the agreement with any CDD outsourcing service provider
- details of any other transactions with the same customer for five years from the date of the transaction
- details of actions taken in respect of internal and external suspicion reports
- details of information considered by the nominated officer in respect of an internal report, Whether or not the nominated officer decides to make a suspicious activity report
- copies of the evidence obtained where the company has been relied on by another person to carry out customer due diligence

- details of the customer due diligence held by another supervised business on which the company is relying.

A written record (including superseded copies) of the following must also be maintained:

- AML risk assessment
- AML policy, controls and procedures
- internal audits of procedures
- a written record of what has been done to make staff aware of the money laundering and terrorist financing legislation and related data protection requirements, as well as the training given to staff

## **6. Audit Procedure**

As part of our on-going commitment to ensuring compliance with the Anti-Money Laundering legislation, we will audit our CDD obligations at least once a year or when there are material changes to the guidance.

- The Compliance Officer will undertake the following duties:
- Review all records produced during the preceding period to ensure compliance with this Policies and Procedures document.
- Ensure all appropriate supporting documentation is held.
- Set in motion any corrective action required as a result of non-compliance
- Take responsibility for any disciplinary action deemed necessary against staff who are found to be in repeated violation of the policies and procedures set out in this document.

## **7. Measurement of Effectiveness**

The policy's effectiveness will be measured in a number of ways in order to ensure it is meeting its intended purpose. These include but are not limited to the following:

- Monitoring of issues and breaches in relation to anti-money laundering/counter-terrorist financing matters;
- Internal Audit and Compliance Oversight Monitoring activity;
- Reports made to Law Enforcement Agencies;
- Training Records;
- Reports and feedback from reviews by, or liaison with, law enforcement and/or regulatory authorities.

## **8. Risk Profile of the business**

### **Sales and Lettings,**

Ashington Page covers both the sale and letting of residential property. The area covered includes Beaconsfield, Seer Green, Jordans, Penn, Tylers Green, Farnham Common, Bourne End and other villages. We cover a broad spectrum of properties in both sales and lettings from 1 bedroom apartments to large, detached, houses.

Typically properties which are sold through our business fall within the value range of £250,000 - £3m ; we are rarely if ever instructed to sell properties valued at over £5m.

The majority of our clients are either owners and occupiers who we meet in person or landlords and owners who do not live in the property. We do deal with clients who live abroad, but this is occasional and rare.

We don't accept instructions from any person who we know is on the UK financial sanctions list.

We don't accept any cash payments in regard to sales fees and do not accept any cash payments from sellers or buyers for other services we provide, they can pay by cheque or bank transfer.

Summary of our risk profile –

- We generally act for residential clients who reside at the properties we market.
- We rarely act for clients who live outside of the UK.
- We meet almost all our clients face-to-face. Clients not met will be treated as higher risk
- We never handle any cash that will be used to purchase the property.
- In the past 12 months, we have not acted for any client who is politically exposed.
- The transactions we are involved in always involve other third parties, such as solicitors, banks, building societies, etc., who are also subject to the same legislation
- We have not acted for any client involved in complex or unusually large transactions, in the past 12 months

As part of our process we carry out an individual risk assessment on each Vendor and Purchaser we deal with. The information used in carrying out the risk assessment is provided to Lifetime Legal who carry out customer due diligence on our behalf.

## **9. Customer Due Diligence Procedures**

A risk assessment must be carried out on each transaction before any estate agency work is carried out with or for a buyer or seller, to determine the level of Customer Due Diligence which is required.

Following the risk assessment, a business relationship may not be established until CDD has been carried out in accordance with the company's current procedures.

For Vendors this means that a property may not be advertised for sale until a pass result has been achieved for **all** relevant customers and beneficial owners.

For Purchasers a Memorandum of Sale must not be completed until a pass result has been achieved for **all** relevant customers and beneficial owners.

Under current procedures for individuals resident in the UK, CDD is deemed to have been completed when all relevant customers and beneficial owners have received an AML Pass result following an electronic ID verification which meets the standards required by the regulator. Further due diligence measures must be taken in certain circumstances, including:

- Where an AML Pass result is not achieved following electronic ID verification;
- Where a customer or beneficial owner is not resident in the UK;
- Where a customer or beneficial owner is not a private individual (ie companies, charities, trusts)
- Where a beneficial owner is Deceased;
- Where a beneficial owner has appointed an Attorney

For the avoidance of doubt, where CDD measures cannot be satisfactorily completed, the company must not establish a business relationship or carry out estate agency work with, or for, the seller or buyer.

Staff are obliged to raise an internal SAR where they know or suspect, or where there are reasonable grounds for having knowledge or suspicion, that another person is engaged in money laundering, or that a terrorist finance offence may be committed. All relevant staff must ensure that they understand what constitutes suspicious activity and are familiar with reporting procedures.

Staff in breach of this policy may be subject to disciplinary action.

Customer Due Diligence is carried out on our behalf by Lifetime Legal, who provide us with a compliance pack for the Vendor and the Purchaser on each transaction. Both packs will contain full customer due diligence in line with our individual risk assessment, while the Vendor pack will also include evidence of ownership.

All Vendors must be referred to Lifetime Legal as soon as we have agreed terms to market the property. All Purchasers must be referred to Lifetime Legal before a Sales Memo can be completed.

### **9.1 Normal Due Diligence**

In carrying out Customer Due Diligence on individuals, Lifetime Legal will:

- confirm the client's full name, current home address, and date of birth;
- obtain a piece of independently verifiable data such as a Driving License, Passport, or National Insurance number;
- use the above to run an online ID verification search against data held by Experian and/or Equifax in line with the client's evaluated risk profile;
- require the client to complete an online facial recognition check which compares their image with the image held in their government-issued ID document, and confirms the validity of the document itself.

We will review the clients circumstances every 3 months before exchange of contracts and in the event of any material changes such as:

- Clients changed their name.
- Clients changed address or country of residence.
- Buying through a different Company.

- Changed from buying with a mortgage to cash.  
Will refresh our customer due diligence and risk assessment as appropriate.

## 9.2 Enhanced Due Diligence

Additional due diligence measures may be required for a variety of reasons, as outlined below:

- Where an AML Pass result is not achieved following electronic ID verification  
Lifetime Legal will obtain certified copies of appropriate documents providing proof of identity and proof of address.
- Where a customer or beneficial owner is not resident in the UK  
Lifetime Legal will obtain certified copies of appropriate documents providing proof of identity and proof of address.
- Where a client resides in a high-risk jurisdiction  
Lifetime Legal will obtain certified copies of appropriate documents providing proof of identity and proof of address and will refer to the MLRO for a decision on whether to proceed with the transaction.
- Where a customer or beneficial owner is not a private individual (ie companies, charities, trusts)  
Lifetime Legal will take all reasonable steps to identify the beneficial owner of the corporate entity and will carry out normal due diligence on all relevant individuals.
- Where a beneficial owner is Deceased  
Lifetime Legal will obtain a copy of the appropriate documents confirming the names of the Executors and will carry out normal due diligence on all relevant individuals.
- Where a beneficial owner has appointed an Attorney  
Lifetime Legal will obtain a copy of the appropriate documentation confirming the names of the Attorneys and will carry out normal due diligence on all relevant individuals
- Where the client or any individual identified under the circumstances set out above is confirmed to be a Politically Exposed Person, a Relative or Close Associate of a Politically Exposed Person.  
Lifetime Legal will obtain a statement from the individual confirming source of funds / wealth and will refer to the MLRO for a decision on whether to proceed with the transaction.
- Where the client is subject to Sanctions  
Lifetime Legal will inform the MLRO and the transaction will not proceed.

### 10. Document Control

Sign Off <i>Angela Robinson</i>		
Name <i>Angela Robinson</i>	Position <i>Director</i>	Date <i>28/7/23</i>
Review		
This policy will be reviewed:		
<ul style="list-style-type: none"> <li>• annually;</li> <li>• in response to any legislative/regulatory changes;</li> <li>• in the event of any known breaches;</li> <li>• in response to any proposed relevant business process or procedural change.</li> </ul>		
The next scheduled review date for this policy is <i>28/7/24</i>		

Version Control			
Version	Author	Sign-off Date	Comments