

## Anti-Money Laundering and Fraud Policy

### 1. Introduction

This policy outlines our commitment to comply with UK anti-money laundering (AML) and fraud prevention laws and regulations. Our goal is to prevent, detect, and report money laundering and fraudulent activities to protect our business and maintain the integrity of the financial system.

### 2. Scope

This policy applies to all employees, contractors, suppliers, and third parties involved in our business operations.

### 3. Legal and Regulatory Compliance

We comply with the following UK laws and regulations:

- **Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017:** Sets out the requirements for customer due diligence, reporting, and record-keeping.
- **Proceeds of Crime Act 2002 (POCA):** Provides the legal framework for dealing with the proceeds of crime, including money laundering.
- **Terrorism Act 2000:** Addresses the financing of terrorism and imposes obligations on businesses to report suspicious activities.
- **Sanctions and Anti-Money Laundering Act 2018:** Provides the framework for implementing sanctions and AML measures.
- **Financial Conduct Authority (FCA) Guidance:** Offers detailed guidance on compliance with AML regulations.

### 4. Anti-Money Laundering Measures

To prevent and detect money laundering, we implement the following measures:

#### 4.1 Customer Due Diligence (CDD)

- **Identification and Verification:** Obtain and verify the identity of customers and suppliers using reliable, independent sources.
- **Beneficial Ownership:** Identify and verify the beneficial owners of corporate customers and suppliers.
- **Ongoing Monitoring:** Continuously monitor customer and supplier transactions to detect unusual or suspicious activity.

#### 4.2 Enhanced Due Diligence (EDD)

- Apply enhanced due diligence measures for high-risk customers, suppliers, transactions, and jurisdictions.
- Obtain additional information on the customer, supplier, and the nature of the business relationship.

### **4.3 Record Keeping**

- Maintain records of customer and supplier identification, transaction details, and due diligence measures for at least five years.
- Ensure records are readily available for inspection by regulatory authorities.

### **4.4 Reporting Suspicious Activity**

- Report any suspicious activity to the National Crime Agency (NCA) through a Suspicious Activity Report (SAR).
- Ensure employees and suppliers are aware of their reporting obligations and the procedures for submitting SARs.

## **5. Fraud Prevention Measures**

To prevent and detect fraud, we implement the following measures:

### **5.1 Internal Controls**

- Establish robust internal controls to prevent and detect fraud, including segregation of duties, access controls, and regular audits.
- Implement a whistleblowing policy to encourage employees and suppliers to report suspected fraud.

### **5.2 Employee and Supplier Training**

- Provide regular training to employees and suppliers on AML and fraud prevention, including how to identify and report suspicious activities.
- Ensure employees and suppliers understand their responsibilities and the importance of compliance with this policy.

### **5.3 Risk Assessment**

- Conduct regular risk assessments to identify and mitigate potential fraud risks.
- Implement appropriate controls based on the risk assessment findings.

## **6. Supplier Compliance**

We require all suppliers to comply with our AML and fraud prevention measures, including:

- Completing an Approved Supplier Questionnaire.
- Adhering to our Business Code of Conduct.
- Signing a Services Agreement that includes AML and fraud prevention clauses.

## **7. Monitoring and Review**

We continuously monitor our AML and fraud prevention measures and review this policy regularly to ensure it remains effective and compliant with current laws and regulations.

## **8. Reporting and Accountability**

All employees and suppliers are responsible for adhering to this policy. Any breaches or concerns should be reported to the compliance department or relevant authorities. We encourage a culture of transparency and accountability to uphold the principles of AML and fraud prevention.

Signed:



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Position: Managing Director

Date: 10/02/2026

