

MONEY LAUNDERING POLICY STATEMENT

As with all Estate Agents, Acquis Consultants Limited (trading as Agents4Buyers) is subject to the Money Laundering Regulations 2017. This means that we must obtain and hold identification and proof of address for all customers. Additionally, we are also required to establish whether there are any beneficial owners on whose behalf the transaction or activity is taking place, hence, we would request you to identify anyone who you would consider to be a beneficial owner. Where appropriate, the source or destination of funds may also be requested. Without this information we will be unable to proceed with any work on your behalf.

Acquis Consultants Limited is committed to ensuring that it has adequate controls to counter money laundering activities and terrorist financing activities, in line with the Money Laundering Regulations 2017 and is registered with HMRC for Anti-Money Laundering Supervision Registration Number: XDML00000132462.

Acquis Consultants Limited is committed to staff training in anti-money laundering legislation and this is also covered as a part of the induction of all new staff.

Acquis Consultants Limited has a Money Laundering Reporting Officer (MLRO) whose responsibility is to receive internal reports and who will forward reports to the National Crime Agency as necessary. The MLRO is Darren Grant.

Adherence to the "Standard Due Diligence" (SDD) identification procedures on every occasion will mitigate the risks of the business being used to launder money or fund terrorism.

It is the policy of Acquis Consultants Limited to search and obtain a copy of the Title Deeds from HM Land Registry to identify the beneficial owners of the property.

It is the policy of Acquis Consultants Limited that all landlords, tenants, vendors and purchasers must be identified fully with a minimum of two forms of ID, evidence of identity being photographic and evidence of residence, for example, a utility bill dated within the last three months. Alternatively, or additionally an approved online electronic money laundering check may be made with an approved supplier.

Should a face to face meeting not take place then enhanced due diligence procedures will need to be adopted by asking for additional information or evidence to establish the customer's identity and ensuring that the documents supplied are certified.

Risk sensitive policies and procedures have been established to anticipate and prevent money laundering and terrorist financing. A risk sensitive or risk-based approach is where businesses assess the risk of customers laundering money through their business. Whilst Acquis Consultants Limited take the starting point that most customers will not launder money, we do identify criteria that may indicate a higher risk of money laundering, for example, where there is no face-to-face meeting to establish identity.

Where an individual is classed as high-risk, we perform "Enhanced Due Diligence" (EDD) checks (please see Due Diligence Policy for further information) and ensure that they are flagged as being in a high-risk category.

We consider high-risk to include:

- Politically Exposed Person's (PEP's)
- Relatives and/or close associates of PEPs
- High-net worth individual/s
- Customers with large and/or complex transactions
- Unusual transactions or unusual patterns
- Entities registered in countries classified as high risk by FATF
- Unregistered organisations
- Foreign investor

Individual Identity Documents

If the verification of the customer's identity is done by documents this should be based on:

A government issued document with the customer's full name and photo with either the customer's date of birth or residential address such as:

A. Proof of identity: (One document from the following)

- Current passport
- Current driving licence
- National identity card
- Firearms certificate

And

B. Proof of address: (One document from the following dated within the last three months)

- Utility bill
- Credit card or bank statement
- HMRC tax coding notice
- NHS medical card
- Council tax bill

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 and 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

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 and 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

A report should be made if a member of staff/ the nominated officer thinks that there is a possibility, which is more than fanciful, that a person is or has been engaged in money laundering or terrorist financing.

The report should be made to the Acquis Consultants Limited MLRO who, should they be satisfied that there are grounds to suspect money laundering or terrorism, will make a Suspicious Activity Report (SAR) to the National Crime Agency (NCA).

What is Suspicious Activity?

This list is by no means exhaustive but includes:

New Customers:

- Reluctance to provide details of their identity
- Customer is trying to use intermediaries to hide their identity or involvement
- There appears to be no genuine reason for the customer using the business's services

Regular/Existing Customers:

- Money is paid by a third party who does not appear to relate to the customer
- The customer requests payment to a third party who has no apparent connection with the customer
- A cash transaction is unusually large and the customer will not disclose the source of funds
- A transaction is carried out for less than market value with an unconnected person

Should a report be made then it is important that this fact and any information about the transaction in question, is kept confidential

Record Keeping

The following records are required to be kept for 5 years:

Copies of, or references to, the evidence obtained of a customer's identity for five years after the end of the customer relationship, or five years from the date when the transaction was completed.

Supporting records relating to a customer relationship or occasional transaction for five years from the date when the transaction was completed.

The purpose for keeping these records is to demonstrate the business's compliance with the regulations and to aid any resulting investigations.