Charlton Grace HW Ltd – Anti-Money Laundering (AML) Policy

Last updated: 1 October 2025
Approved by: Katie Grace
Applies to: All staff, contractors, and representatives of Charlton Grace HW Ltd

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1. Purpose

This Anti-Money Laundering (AML) Policy sets out Charlton Grace HW Ltd's approach to preventing its business from being used for money laundering or terrorist financing.
As a property sales estate agency, Charlton Grace HW Ltd recognises its obligations under the **Money Laundering Regulations 2017 (as amended)**, the **Proceeds of Crime Act 2002**, and the **Terrorism Act 2000**.

The purpose of this policy is to ensure that all employees understand and comply with the legal requirements and the company's internal procedures to prevent money laundering and financial crime.

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2. Scope

This policy applies to:

- All property sales transactions handled by Charlton Grace HW Ltd
- All employees, directors, and consultants involved in sales and client onboarding
- All clients, whether buyers or sellers

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3. Policy Statement

Charlton Grace HW Ltd is committed to:

- Complying fully with all AML legislation and regulations
- Implementing effective systems and controls to mitigate the risk of money laundering and terrorist financing
- Conducting thorough **Customer Due Diligence (CDD)** and **Enhanced Due Diligence (EDD)** where required
- Maintaining appropriate records and reporting any suspicious activity to the **Money Laundering Reporting Officer (MLRO)**

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4. Responsibilities

4.1 The Money Laundering Reporting Officer (MLRO)

The appointed MLRO is:
Name: Katie Grace
Title: Money Laundering Reporting Officer

Email: katie@charltongrace.co.uk
Phone: 01252 844744

The MLRO is responsible for:

- Receiving and evaluating internal reports of suspicious activity
- Deciding whether to submit a **Suspicious Activity Report (SAR)** to the **National Crime Agency (NCA)**
- Ensuring staff are trained and aware of their AML obligations
- Maintaining AML records and ensuring compliance with HMRC guidance

4.2 All Staff

All employees are required to:

- Carry out customer due diligence checks before entering a business relationship or transaction
- Report any knowledge or suspicion of money laundering or terrorist financing to the MLRO without delay
- Participate in AML training sessions
- Maintain confidentiality and avoid "tipping off" any client about a report or investigation

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5. Customer Due Diligence (CDD)

Before proceeding with any property transaction, Charlton Grace HW Ltd will verify the identity of all clients (both buyers and sellers).

5.1 Standard CDD

- **For Individuals:**
    - Obtain and verify full name, date of birth, and current residential address
    - Acceptable documents include passport, driving licence, and recent utility bill or bank statement (within 3 months)
- **For Companies:**
    - Obtain company registration number, registered address, and details of directors
    - Identify and verify **beneficial owners** (individuals owning or controlling 25% or more of the company)

5.2 Enhanced Due Diligence (EDD)

EDD will be applied when:

- The client is not physically present during identification
- The client or transaction involves a high-risk country or complex ownership structure

- There are unusual or suspicious transaction patterns
- Transactions totalling over £10,000.

EDD may include:

- Obtaining additional verification documents
- Conducting independent online verification
- Seeking senior management approval before proceeding

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6. Record Keeping

Charlton Grace HW Ltd will retain:

- Copies of identification and verification documents
- Details of transactions and correspondence
- Internal and external AML reports

All records will be securely kept for **at least 5 years** after the end of the business relationship or transaction, in accordance with legal requirements.

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7. Reporting Suspicious Activity

If an employee knows or suspects that a person is engaged in money laundering or terrorist financing, they must report it immediately to the MLRO using the internal **Suspicious Activity Report (SAR) form**.

The MLRO will:

1. Assess the report and gather further information if necessary.
2. Determine whether the suspicion warrants a formal report to the **National Crime Agency (NCA)**.
3. Record the rationale for all decisions taken.

No employee should inform the client that a report has been made (this is known as **tipping off** and is a criminal offence).

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8. Training

All staff will receive regular AML training covering:

- The law and their obligations
- How to recognise suspicious activity
- Procedures for reporting concerns to the MLRO
- Penalties for non-compliance

Training will be provided:

- Upon induction
- Annually, or more frequently where needed

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9. Risk Assessment

Charlton Grace HW Ltd conducts a documented **Firm-Wide Risk Assessment (FWRA)** considering:

- The nature and type of clients
- Geographic risks (domestic vs overseas clients)
- Transaction values and payment methods
- Delivery channels (face-to-face or remote)

Risk assessments are reviewed annually or following significant business changes.

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10. Compliance Monitoring

The MLRO will conduct periodic reviews of:

- Client files and CDD documentation
- Training records
- Internal SARs and decisions
- HMRC registration and renewal status

Any deficiencies will be reported to senior management and corrective actions implemented.

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11. Consequences of Non-Compliance

Failure to comply with this policy or AML legislation may result in:

- Disciplinary action, including dismissal
- Personal criminal liability (fines and imprisonment)
- Regulatory sanctions or loss of HMRC registration

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12. Review

This AML Policy will be reviewed **annually** or earlier if there are significant changes to legislation, regulatory guidance, or business operations.

Signed: ______________________________

Name: Katie Grace
Position: Director, Charlton Grace HW Ltd
Date: 1 October 2025