Anti-Money Laundering Policies and Procedures Template:

Instructions for Use

If you wish to use the policy template, you must:

- ✓ Ensure you have read and fully understood the policy
- ✓ Come back to us with any questions you may have
- ✓ There are various notes sections in RED; you need to edit the policy in these places as well as the highlighted areas, so it reflects your business circumstances
- ✓ Once you have reviewed and changed the policy, please ensure it is circulated to your team
- ✓ Evidence you have done the above
- ✓ Make sure your team know who the Money Laundering Reporting Officer (MLRO) is
- ✓ Make sure your team know the process to take in each Normal or Enhanced-Risk situation
- ✓ All your team know where the policy document is located

Things to be aware of:

- ✓ You cannot just file this policy in your files in order to cover your business from your responsibilities
- ✓ This talks about how you use the LandmarkAgent System to identify individuals (Sellers & Buyers) and the process we suggest you follow in order to comply with HMRC guidelines when you are dealing with your Customer Due Diligence
- ✓ If you use this policy, you need to understand the content and then be able to evidence to HMRC that these are steps you have taken in order to apply the appropriate Customer Due Diligence to each case
- ✓ Please make sure you are comfortable with the suggested routes to apply Normal or Enhanced-risk Customer Due Diligence

If you have any questions at all about the template or how to use it, then please get in touch with your Customer Success Manager directly. Or call our support team on 01524 220013 and we will direct you through to the relevant person.

Landmark
Estate Agency Services

Business Owners & Partners :

Mr S Thickbroom & Mrs T Blake - Mr M Richardson & Mr J Gallant

Blake & Thickbroom Estate Agents

Registered in England. No. n/a

Anti-Money Laundering Policies and Procedures

Title: Mr S Thickbroom Partner

Date of Implementation: 20/04/2026

Approved & Signed: S Thickbroom

HMRC Anti-Money Laundering Registration Number: XZ006968061531

Contents

1. Nominated and Deputy Officer

The Nominated Officer for this business is -

Name: Ms T Blake
Title: Partner
Contact Address/Branch: 70 Station Road, Clacton on Sea, Essex, CO15 1SP
Telephone Number: 01255 688788
Email Address: enquiries@blake-thickbroom.co.uk

The Deputy Nominated Officer will take on the role and responsibilities of the Nominated Officer in the absence of the Nominated Officer.

The Deputy Nominated Officer for this business is -

Name: Mr David Allis
Title: Office Manager
Contact Address/Branch: 70 Station Road, Clacton on Sea. Essex, CO15 1SP
Telephone Number: 01255 688788
Email Address: davidallis@blake-thickbroom.co.uk

Nominated Officer's responsibilities include:

- Ensure a system is in place to receive reports of suspicious activity from all staff and that staff are trained on this system
- Consider any potentially suspicious activity reports made to you by anyone on the business
- Have a system in place to decide if a SAR needs to be raised with the National Crime Agency (NCA)
- Ensure that records are kept where necessary once a decision has been made to whether to report an individual or not

2. Compliance Officer

The Compliance Officer for this business is -

Name: Mr S Thickbroom
Title: Partner
Contact Address/Branch: 70 Station Road, Clacton on Sea, Essex, CO15 1SP
Telephone Number: 01255 688788
Email Address: stevethickbroom@blake-thickbroom.co.uk

Compliance Officer's responsibilities include:

- Carry out regular audits on the compliance within the business
- Actively check if the business adheres to the policies and controls set out by HMRC
- Make sure the staff are adhering to the customer due diligence procedure set out in this document
- All clients are assessed and the necessary Normal and Enhanced level of CDD is carried out
- To have oversight of the screening of relevant staff
- Ensure records on individuals are kept for the requisite 5 years
- Continually monitor the system and put in place processes to rectify any highlighted problems.

- Ensure staff are trained on the regulations and any changes that are made to the regulations and what to do if they deem any activity suspicious
- Ensure staff know the names of the nominated officer and any deputy
- Review reports of any PEPs and determine next steps
- Review reports of any WWS and determine next steps
    - Lettings of all values – report to OFSI
    - Sales transactions – report to OFSI
- Review potential anti money laundering, terrorism and proliferation financing activity
    - Sales (or Lettings over the value €10,000) – report to NCA by submission of a Suspicious Activity Report
- Sales (or lettings where the monthly rent is £10,000+ or on occasional transaction is £12,000+) – where suspicion arises, a Suspicious Activity Report must be considered and, where appropriate, submitted to the National Crime Agency

3. Money Laundering and Estate Agency Business

Money laundering is how criminals change money and other assets into clean money or assets that have no obvious link to their criminal origins. Money laundering can take many forms, but in the property sector it can involve:

- Buying a property asset using the proceeds of crime, letting it or selling it on, giving the criminal an apparently legitimate source of funds
- Criminals hiding behind complex company structures involving multiple countries and multiple bank accounts to disguise the real purpose of a transaction and hide its beneficial ownership
- A more direct method of paying an estate agency business or lettings agents a large amount and reclaiming it later
- The money for a purchase resulting from a mortgage fraud operation

Many estate agency businesses may not handle client money but will have knowledge of both parties to a transaction, or intermediaries and how a purchase is funded. Other estate agency businesses, such as auctioneers may handle deposits.
Tax evasion is a criminal offence that can lead to money laundering, for example, the sale price of a property may be set below the Stamp Duty threshold by manipulating the price of furniture and fittings. Tax may also be evaded by hiding behind complex legal structures. The procedures of crime include the proceeds of corruption and super-prime property is an attractive way for individuals to hide this money.

3.1 Terrorist Financing

Terrorist financing involves dealing with money or property that you have reasonable cause to suspect may be used for terrorism. The funds and property may be gained from either legitimate or criminal sources. This may be small amounts.

3.2 Proliferation Financing

Proliferation financing means the act of providing funds or financial services for use, in whole or in part, in the manufacture, acquisition, development, export, trans-shipment, brokering, transport, transfer, stockpiling of, or otherwise in connection with the possession or use of, chemical, biological, radiological or nuclear weapons, including the provision of funds or financial services in connection with the means of delivery of such weapons and other CBRN-related goods and technology, in contravention of a relevant financial sanctions obligation.

3.3 Legislation

The primary UK legislation covering anti money laundering, counter-financing of terrorism and proliferation financing purposes are:

- Proceeds of Crime Act 2002
- Terrorism Act 2000
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to in this guidance as 'the Regulations') *NB these Regulations include reference to Proliferation Financing*
- Criminal Finances Act 2017
- Terrorist Asset-Freezing Act 2010
- Counter terrorism Act 2008, Schedule 7
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (referred to in this guidance as 'the Regulations') NB these Regulations include reference to Proliferation Financing, *as amended, including by the Money Laundering and Terrorist Financing (Amendment) Regulations 2026*

Information on Sanctions can be found through:

- HM Treasury Sanctions Notices
- Guidance
- News releases
- The business will apply its AML policies and procedures in accordance with the Money Laundering Regulations as amended from time to time, including any applicable updates to customer due diligence, enhanced due diligence and transaction thresholds.

3.4 The Proceeds of Crime Act 2002

- Concealing, disguising, converting, transferring or removing criminal property from the UK
- Entering into or becoming involved in an arrangement which facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person
- The acquisition, either use or possession, or both, or criminal property

Under the Proceeds of Crime Act it is also an offence to fail to report suspicious activity and tipping off any person that you've made such a report. This applies to nominated officers and employees of businesses in the regulated sector, such as estate agency businesses.

This duty extends across the whole business, so an estate agency business which also does lettings must also submit suspicious activity reports where suspicion arises within lettings.

The Terrorism Act sets out the primary offences relating to terrorist funding. Regulated businesses, like estate agency businesses, must report belief or suspicion of offences related to terrorist financing, such as:

- Fundraising for the purposes of terrorism
- Using or possessing money for the purposes of terrorism
- Involvement in funding arrangements
- Money laundering – facilitating the retention or control of money that is destined for, or is the proceeds of terrorism

The Criminal Finances Act 2017 make important amendments to the Proceeds of Crime Act, the Terrorism Act and the Anti-terrorism Crime and Security Act. It extends the power of law enforcement to seek further information, recover the proceeds of crime and combat the financing of terrorism. Involvement in money laundering offences may result in either unlimited fines, a prison term of up to 14 years, or both.

If a person or business fails to meet with the Regulations, they may face civil penalties or criminal prosecution. This could result in unlimited fines with a prison term of up to 2 years. You can find information on the penalties HMRC can issue.

Not meeting the regulations may lead to money laundering charges under the Proceeds of Crime Act 2002.

4. Company Audit Procedure

As part of our on-going commitment to ensuring compliance with the 5th Money Laundering Directive, we will audit our CDD obligations (at least once a year) or when there are material changes to the guidance.

(Ms Tracey Blake) will undertake the following duties:

- Ensure all appropriate supporting documentation are 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 this document

(Mr David Allis) will undertake the following duties: In the absence of the Nominated officer

- Ensure all appropriate supporting documentation are 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 this document

(Mr Steve Thickbroom) will undertake the following duties: It is recommended that the Nominated officer and Compliance officer are not the same person where possible

- Making sure compliance throughout the business (including subsidiaries and branches) with anti-money laundering legislation and internal policies, controls and procedures
- Actively checking adherence to the policies, controls and procedures
- Reviewing how effective these are
- Recommending and implementing improvements following such reviews

5. Record Keeping

We run all checks via the Landmark Agent system on either normal or enhanced risk, in accordance with our risk assessment. We do not generally need to keep any photo identity documents for simplified or normal risk checks but may need to when running an enhanced risk search. If documents are needed, they will be retained on file for the requisite 5 years.

All electronic checks are retained for 5 years. Also, all hardcopies are retained on file for 5 years in line with requirements.

6. Client Risk Assessments

We will conduct a risk assessment on our clients prior to listing the property for Sellers and between offer accepted and contracts exchanged for Purchasers. The risk assessment is outlined in Section 9 for Sellers and 10 for Buyers. This will be conducted manually/via an electronic assessment available through Landmark Agent.
We have 3 levels of customer due diligence:

- Simplified Due Diligence
- Normal Due Diligence
- Enhanced Due Diligence

6.1 Simplified Due Diligence Process

It is appropriate for a business that is regulated or a known business/institution to be similarly regulated by HMRC, such as a UK local authority or a UK publicly listed company/body. Evidence is needed to show that the client qualifies for having simplified due diligence applied to them, such as recording information from Companies House. Additionally, there must be evidence that the contact from that business has the authority to represent the business. For further questions on how to carry this out, please contact the Customer Success Manager.

6.2 Normal Risk – Normal Due Diligence

Individuals:

We have two options for completing AML checks on the Landmark Agent system. Please choose which is appropriate to the situation:

- Option 1: Requires the person to provide you with their full name, contact telephone number and email address. The system sends out an AML with Biometric Facial Recognition check request via Landmark Agent to the individual to complete. The result is returned and stored on the Landmark Agent System.

- Option 2: Requires the person to provide you with their full name, current home address and date of birth so we can run them through the Landmark Agent system as a Standard check.
- If the client's circumstances change throughout the transaction, we will review any such change and may change the risk we apply to the client/individual.

Businesses:

- See our process in Section 11 – Customer Due Diligence Matrix

6.3 Enhanced Risk – Enhanced Due Diligence

Individuals

We have two options for completing AML checks on the Landmark Agent system. Please choose which is appropriate to the situation:

- Option 1: Requires the person to provide you with their full name, contact telephone number and email address. The system sends out an AML with Biometric Facial Recognition check request via Landmark Agent to the individual to complete. The result is returned and stored on the Landmark Agent System.
- Option 2: Requires the person to provide you with their full name, current home address and date of birth so we can run them through the Landmark Agent system as a Standard check.
- Consider taking additional measures in line with the circumstances surrounding the transaction (see below for examples of typical Enhanced-risk situations).
- Enhanced Due Diligence will be applied where required based on a risk-based approach. This includes situations where a transaction is assessed as being unusually complex or unusually large for the type of transaction, taking into account the nature of the customer, the transaction, and the business relationship.
- Transactions will not be treated as higher risk solely due to their size or complexity. Instead, considerations will be given to whether the transaction is out of line with that would normally be expected for the customer or type of transaction.

Businesses:

- See our process in Section 11 – Customer Due Diligence Matrix

6.4 Politically Exposed Persons

- We will ID all PEPs using the Landmark Agent system. Once flagged as a PEP we will revisit the case and take the appropriate steps, we may apply enhanced due diligence on a politically exposed person, their relatives and close associates, based on their circumstances and/or territory
- All PEPs or relative and close associates must be discussed with the nominated officer prior to proceeding with the transaction.

6.5 UK Treasury Financial Sanctions List (WWS)

- For Sales and Letting transactions we will identify if an individual is on the sanctions list by using the Landmark Agent system
- Anyone who is identified to be on the sanctions list will be reported immediately to the Nominated officer and we will not further the transaction in any way

6.6 Ongoing Monitoring of the Clients Risk Profile

It is the responsibility of all employees to be diligent when dealing with Sales and or/Lettings to monitor the transaction from start to end. If there are any material changes in circumstances to our client, buyer, tenant or guarantor that would change the risk we applied, the Nominated Officer will be informed, and the case file reviewed.

6.7 Additional Regulated Activity

6.7.1 Cryptoassets

- Where the business becomes involved in a transaction involving cryptoassets, or where funds used in a transaction are derived from cryptoassets activity, the business will assess whether this creates an increased money laundering or terrorist financing risk.
- In such cases, the business will consider whether Enhanced Due Diligence is required, taking into account the source of funds, source of wealth, the identity of the parties involved, the transparency of the transaction, and whether the use of the cryptoassets makes It more difficult to understand the purpose or nature of the transaction.
- The Nominated Officer must be informed of any transaction involving cyptoassets before the transaction is permitted to proceed.
- Where appropriate, additional evidence will be requested in order to understand the origin of the funds and the reason for the use of cryptoassets in the transaction.

6.7.2 Pooled Accounts

- Where the business provides, operated or makes use of a pooled account arrangement in connection with a customer or transaction, the business will take reasonable steps to understand the purpose of the pooled account and assess the money laundering and terrorist financing risks associated with it.
- The business will ensure that appropriate records are maintained in relation to the pooled account, including the purpose of the arrangement, the persons connected to it where relevant and the basis on which the business is satisfied that the arrangement is appropriate.
- Where the use of a pooled account increased the level of risk, the business will apply enhanced due diligence measures and refer the matter to the Nominated Officer.

6.7.3 Insolvent Bank Customers Arrangements

- Where the business is involved in any arrangement connected to an insolvent bank customer, or any arrangement in which customer due diligence timing is affected by insolvency-related banking provisions, the business will ensure that the matter is referred immediately to the Nominated Officer and where necessary external legal or compliance advice is obtained
- The business will not rely on any modified timing provisions unless it is satisfied that those provisions apply to the business and the circumstances concerned.
- A written record of the decision-making process and the rationale for proceeding must be retained on file.

6.7.4 Off-the Shelf Companies and Company Service Activity

- Where the business provides, introduces, facilitates, or is otherwise involved in the sale of transfer of an off-the-shelf company, or provides company-related formation or structure services, the business will treat this activity as presenting an increased money laundering risk.
- The business will identity and verify the customer, any beneficial owner and any person acting on behalf of the customer and will take reasonable steps to understand the intended purpose of the arrangement and the ownership and control structure involved.

- The Nominated Officer must be informed before business proceeds with any such arrangement and additional due diligence must be considered where the ownership structure is complex, on-transparent, or involves overseas parties.

6.7.5 Correspondent relationships

- Where the business enters into or relies upon any correspondent relationship or comparable ongoing relationship with another regulated entity for the purpose of delivering regulated services, the business will assess the money laundering and terrorist financing risk of that relationship before proceeding.
- This assessment will include consideration of the other party's regulatory status, ownership and control, reputation and the purpose of the relationship.
- Enhanced Due Diligence will be considered where the relationship presents a higher risk, and the Nominated Officer must approve the relationship before it is established.

7. Acceptable Proof of ID and Residency for Individuals in Enhanced Risk/EDD Situations

ACCEPTABLE PHOTOGRAPHIC IDENTIFICATION

The following documents may be used as evidence of personal identity:

- Current signed passport
- EU member state identity card
- Current photo card driving license (Full or Provisional)
- Armed Forces ID card
- Firearms or shotgun certificate
- Identity card issued by the Electoral Office for Northern Ireland
- Acceptable Confirmation of Address

The following documents may be used as evidence of address:

- The most recent utility bill/statement (must be issued within the last 3 months) or a certificate from a utility supplier confirming a pre-payment arrangement for services. Mobile phone bills are not acceptable
- Most recent original bank, building society or credit union statement (must be issued with the last 3 months), or passbook containing current address (must have been updated within the last three months)
- Local council or housing association rent card or tenancy
- Most recent original mortgage statement from a recognised lender
- HMRC issued document concerning tax matters such as - Tax Demand, Self-Assessment, PAYE Coding, Tax Credit. A P60 or P45 is not acceptable as this is produced by the employer.
- Current UK/EU Photo Driver's License. This is not acceptable for both personal and address ID
- Paper version of current UK/EU Driver's License
- State Pension or Benefits Book/Notification Letter

8. Customer Due Diligence – Sellers

Customer Due Diligence has to be carried out each time instructions are given to us prior to marketing the property. This is irrespective of whether the client is an individual or a business.

A customer's identity and, where applicable, the identity of any beneficial owners, must be verified before, or at the point of accepting any instruction from a client.

8.1 Steps to Take

1. Upon instruction of the property, a risk assessment is to be conducted on the Beneficial Owner/s. This is detailed below.
2. The normal or enhanced due diligence process needs to be carried out on the Beneficial Owners (based on the result of the risk assessment) via the Landmark Agent system
3. Based on the result, further documentation may need to be collected and the Nominated Officer contacted for further advice (see Enhanced risk process).
4. In cases where a Seller refuses to supply further ID information when required, they will be immediately reported to the Nominated Officer and we may have to stop marketing the property.
5. Where issues in obtaining ID gives reason to suspect a problem with the client's identification and/or suspicions of money laundering, the Nominated Officer MUST be advised.
6. Red flags for Property Fraud – the list below should be considered in conjunction with all risk assessments

Red flags for Property Fraud

Business Source

- Unusual introducer
- Proximity of the party to estate agent and/or their legal representation – if there is a distance, why?

Seller Characteristics

- Absent owner or landlord
- Owner/Seller living abroad
- Recently issued (new) ID documents/driving licence etc
- Seller's lack of knowledge about the property
- Where the Seller lives at a different address from the property and has no documentary evidence such as bills or building insurance schedule linking Seller to the property
- Proximity of a signatory to the witness – if there is a distance, why? What is the relationship between the signatory and the witness?
- Email contact (remote client)
- Sole proprietor
- Long-time owners (high equity)
- Use of intermediaries to conduct the transaction
- Difficulty in identifying beneficial owners through complicated legal entities

Buyer Characteristics

- Buyers you do not meet or are reluctant to meet
- Difficulty in conducting Customer or Enhanced Due Diligence
- Foreign investors/Buyers living abroad
- Property has not been inspected prior to purchase
- Value of the purchase is apparently beyond their means, with no satisfactory explanation of source of funds
- Proximity from estate agent and /or legal representation – if there is a distance, why?
- Use of intermediaries to conduct the transaction
- Where you have an existing relationship, the transaction is different from the normal business of the customer

Property Characteristics

- Empty
- Tenanted
- Unencumbered (no mortgage)
- High value
- Unregistered
- Where there is no restriction on the register to comply with

Other Characteristics

- Quick sale required
- Quick, back to back sale (increased price)
- Funds going abroad or to an unusual destination
- End of chain transaction

8.2 Risk Assessment - Seller

[Stage 1]: Does your client require simplified due diligence?

Types of customers that may indicate simplified due diligence include:

- a public authority or publicly owned body in the UK
- a financial institution that is itself subject to anti-money laundering supervision in the UK or equivalent regulation in another country
- a company whose securities are listed on a regulated market
- beneficial owners of pooled accounts held by a notary or independent legal professional, provided information on the identity of the beneficial owners is available upon request
- a European Community institution
- a pension scheme that does not allow assignment of interests

If your client falls into one of these categories, make sure you get the letter of authority to buy or sell the property; and that you have identified the structure of the company/body buying the property.

<u>If not, proceed to Stage 2 of the risk assessment.</u>
Make sure you store the information on the property file.

Refer to the matrix at the end of the policy

9. Customer Due Diligence - Buyers

Customer Due Diligence must be carried out on all Buyers, prior to contracts exchanged. This is irrespective of whether the Buyer is an individual or a business.

A Buyer's identity needs ideally to be verified once an offer has been accepted, and we are preparing the Memorandum of Sale to be sent out to all parties.

9.1 Steps to Take

1. Confirmation in writing of the acceptance of the offer is then sent.
2. Upon Memorandum of Sale, a risk assessment is to be conducted on the Buyer. Detailed below.
3. An online check based on the result of the Risk Assessment below is to be carried out on the Buyer(s) via the Landmark Agent system (see section 6 Normal and Enhanced AML processes).
4. In cases where a Buyer refuses to supply further ID information when required, they will be immediately reported to the Nominated Officer.

9.2 Risk Assessment - Buyer

[Stage 1]: Does your client require simplified due diligence?

Types of customers that may indicate simplified due diligence include:

- a public authority or publicly owned body in the UK
- a financial institution that is itself subject to anti-money laundering supervision in the UK or equivalent regulation in another country
- a company whose securities are listed on a regulated market
- beneficial owners of pooled accounts held by a notary or independent legal professional, provided information on the identity of the beneficial owners is available upon request
- a European Community institution
- a pension scheme that does not allow assignment of interests

If your client falls into one of these categories, make sure you get the letter of authority to buy or sell the property; and that you have identified the structure of the company/body buying the property.

<u>If not, proceed to Stage 2 of the risk assessment.</u>

Make sure you store the information on the property file.

Refer to the matrix at the end of the policy

10. Customer Due Diligence Matrix

By conducting the client risk assessment this will inform which customer due diligence route needs to be followed. If you have any doubts speak to the Nominated Officer.

10.1 Normal Risk – Normal Due Diligence

a) Where a score of 1-8 is registered for standard Buyer/s and Seller/s. Follow this process:

- Check Beneficial Ownership via Land Registry on the Landmark Agent system
- Run a normal due diligence process (see section 6) on the individual/s on the Landmark Agent system
- Results to be stored on Landmark Agent system in case file and held for 5 years

b) Where the client/s is/are acting as an executor/s of the will of the property owner. Follow this process:

- Obtain a copy of the will appointing the executor
- Check the title of the property with the Land Registry to confirm ownership as in A above
- Follow normal due diligence process (see section 6) on the client/executor as in A above

c) Where the client/s is/are acting with power of attorney for the property/Beneficial Owner. Follow this process:

- Obtain a copy of the power of attorney document to confirm client authority
- Check the title of the property with the Land Registry to confirm ownership in the donor name as in a) above
- Follow normal due diligence process (see section 6)

d) Where the client/s is/are a UK Limited company (LTD) or Limited Liability Partnership (LLP). Follow this process:

- Obtain full details of the following: companies registered name, number, registered office address and principal place of business
- Conduct a Companies House check via the Landmark Agent system to obtain the names of the Directors, and the share register report to ascertain and identify the shareholders of the company with 25% or more of shares
- Ensure the person instructing you has the authority to instruct you on behalf of the company
- Conduct normal due diligence process (see section 6) on the person instructing you and everyone with a 25% or more share in the business

NOTE: Corporate bodies are obligated to provide the information below to estate agents where they instruct them to market properties for sale. They are obliged to provide the information within 2 working days of you requesting this information by providing the company with the Company Details Request Form.

Provision of Information obligation:

- Company name
- Registered number
- Registered office
- Principal place of business

e) Where the client/s is/are a Sole Trader/Partnership. Follow this process:

- Follow normal due diligence process (see section 6) on the Sole Trader/Partners of the business

f) Where the client/s is/are an agent acting on/Behalf of the property owners. Follow this process:

- Conduct Customer Due Diligence on the agent who is your client, using the risk assessment matrix and then the Landmark Agent system
- Following a) above; alternatively collect the instructing agent's due diligence if we have an arrangement

10.2 Enhanced Risk – Enhanced Due Diligence

Where the client(s) has scored 9 or above, or where we are dealing with a letting transaction with a monthly rent of £10,000 or more per calendar month (PCM), or an occasional transaction of £12,000+

a) Follow this process:

- Check Beneficial Ownership via Land Registry on the Landmark Agent system
- Run Enhanced risk process (see section 6) on the Landmark Agent system
- Results to be stored on the Landmark Agent system in case file and held for 5 years

b) Where the clients have not been met in person/ face-to-face, or they are a Non-UK residents based overseas; follow this process:

- If they are the Seller, check the Title of the property with the Land Registry to confirm ownership is in the given person's name (see point a. above)
- Carry out extra steps to identify the person you are dealing with is who they say they are, typical steps:
    - Carry out a EIDV/IEIDV (Facial Recognition) check on the Landmark Agent system
    - If this is not possible, get them to obtain certified ID (this could be from a solicitor, post office or other accredited body) to prove they are who they say they are. If from an accredited body, consider checking the accredited body credentials
- Consider a video call with the client after checks have been carried out
- Ask for other documents relating to proof of funds, and further information on the reason to sell/buy
- Document findings
- Follow Enhanced-risk process (see section 7.3)
- Where a client, transaction or business relationship, involves a jurisdiction that FATF has identified as subject to a Call for Action (also known as the 'black list'), Enhanced Due Diligence will be applied.
- If the above applies to countries on FATF's Increased Monitoring list (often referred to as the grey list), Enhanced Due Diligence is not automatically applied, however it could still be required and does not mean these jurisdictions become low risk
- FATF: 'Black and grey' lists is used to continuously monitor changes by jurisdiction.

c) Where the client/s is/are acting as an executor/s of the will of the property owner. Follow this process:

- Obtain a copy of the will appointing the executor
- Check the title of the property with the Land Registry to confirm ownership as in a) above
- Follow Enhanced risk process (see section 7.3) on the client/executor

d) Where the client/s is/are acting with power of attorney for the property/Beneficial Owner. Follow this process:

- Obtain a copy of the power of attorney document to confirm client authority
- Check the title of the property with the Land Registry to confirm ownership in the donor's name as in a) above
- Follow Enhanced risk process (see section 7.3) on the client

e) Where the client/s is/are a UK Limited company (LTD) or Limited Liability Partnership (LLP). Follow this process:

- Obtain full details of the following: companies registered name, number, registered office address and principal place of business
- Conduct a Companies House check via the Landmark Agent system to obtain the names of the Directors
- Ensure the person instructing you has the authority to instruct you on behalf of the company

- Conduct Enhanced risk process (see section 7.3) on the person instructing you and everyone with a 25% or more share in the business

NOTE: Corporate bodies are obligated to provide the information below to estate agents where they instruct them to market properties for sale. They are obliged to provide the information within 2 working days of you requesting this information by providing the company with the Company Details Request Form.
Provision of Information obligation:

- Company name
- Registered number
- Registered office
- Principal place of business

f) Where the client/s is/are a Sole Trader/Partnership. Follow this process:

- Follow Enhanced risk process (see section 7.3) on the Sole Trader/Partners of the business

g) Where the client/s is/are an agent acting on/Behalf of the property owner/s. Follow this process:

- Conduct Enhanced risk process (see section 7.3) on the agent who is your client, using the risk assessment matrix and then the Landmark Agent system
- Alternatively collect the instructing agent's due diligence if we have an arrangement

h) For lettings where an occasional transaction is £12,000+, or monthly rental value is £10,000 or higher. Follow this process:

- Landlord or Tenant is instantly to be treated as a Enhanced risk
- Conduct Enhanced risk process (see section 6) on the Landlord/s & Tenant/s
- Consider asking for the proof and source of funds

i) Where we are instructed by a Trust to buy or sell a property they own. Follow this process:

- Obtain, the trust full name, registered address and trust deed
- Obtain information on the transaction and reasons for, note in risk assessment
- Identify and verify the Trustee, acting on behalf of the trust – by following the Enhanced risk process laid out in a) above
- Obtain information (where appropriate) on the business relationship/ transaction.
- Identify and verify the settlor – by following the Enhanced risk process laid out above

11. Politically Exposed Person

A Politically Exposed Person (PEP) is someone that is entrusted with prominent public functions. This definition also includes their relatives and any known close associates also known as a Politically Exposed Person by association. This can be in any country including the UK.

We identify PEPs, RCA (relatives and close associates) using the Landmark Agent system which is updated on a daily basis. These updates are run against the UK Digital Identity and Attributes Trust Framework.

Prominent public functions are defined as, but are not limited to:

- Heads of state, Heads of Government, Ministers and Deputy or Assistant Ministers
- Members of parliament or of similar legislative bodies
- Members of the governing bodies of political parties
- Members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions of which are not subject to further appeal, except in exceptional circumstances
- Members of courts of Auditors or of the boards of central banks
- Ambassadors, chargés d'affaires and high-ranking officers in the armed forces
- Members of the administrative, management or supervisory bodies of state-owned enterprises
- Directors, Deputy Directors and members of the board or equivalent function of an international organisation

Family members are defined as, but not limited to:

- Spouse or Partner of that person
- Children of that person and their Spouses or Partners
- Parents of that person

Known close associates are defined as, but not limited to:

- An individual known to have joint Beneficial Ownership of a legal entity or a legal arrangement or any other close business relationship with a Politically Exposed Person

- An individual who has sole Beneficial Ownership of a legal entity or a legal arrangement which is known to have been set up for the benefit of a PEP

Regulation segments the following characteristics into Normal and Enhanced risk indicators that should be considered when assessing client risk. These are not exhaustive.

11.1 Normal - Risk Indicators

a) Geographical:

- Associated with low levels of corruption
- Political stability and free and fair elections
- Strong state institutions
- Credible anti-money laundering defences
- A free press with a track record for probing official misconduct
- An independent judiciary and a criminal justice system free from political interference
- A track record for investigating political corruption and taking action against wrongdoers
- Strong traditions of audit within the public sector
- Legal protections for whistle-blowers
- Well-developed registries for ownership of land, companies and equities

b) Personal and Professional:

- Is subject to rigorous disclosure requirements (such as registers of interests, independent oversight of expenses)
- Does not have executive decision-making responsibilities (such as a government MP with no ministerial brief or an opposition MP)
- Has ceased to be a PEP for at least 12 months

11.2 Enhanced - Risk Indicators

a) Geographical:

- Associated with high levels of corruption
- Political instability
- Weak state institutions
- Weak anti-money laundering defences
- Armed conflict
- Non-democratic forms of government
- Widespread organised criminality
- A political economy dominated by oligopolistic actors with close links to the state
- Lacking a free press and where legal or other measures constrain journalistic investigation
- A criminal justice system vulnerable to political interference
- Lacking expertise and skills related to book-keeping, accountancy and audit, particularly in the public sector
- Law and culture antagonistic to the interests of whistle-blowers
- Weaknesses in the transparency of registries of ownership for companies, land and equities

b) Personal and Professional:

- Personal wealth or lifestyle inconsistent with known legitimate sources of income or wealth
- Subject to credible allegations of financial misconduct (e.g. facilitated, made, or accepted bribes)

- There is evidence they have sought to disguise the nature of their financial circumstances
- Is responsible for, or able to influence, large public procurement exercises, particularly where procurement is not subject to competitive tender, or otherwise lacks transparency
- Is responsible for, or able to influence, allocation of scarce government licenses such as mineral extraction concessions or permission for significant construction projects

12. Staff Reporting of Money Laundering Concerns

Any member of staff with any concerns that have reasonable grounds for suspecting Money laundering should take into account factors such as:

- The nature/origin of the transaction
- Proof and source of funds
- Cash or assets not being disclosed when asked or being disclosed at a later date
- Unusually large cash or foreign currency being used to fund the transaction
- The transaction is unusually complex or unusually large given the nature of the customer, property and /or transaction.
- Whether the customer/s and/or the supplier of funds have any links to criminal/s, terrorists, terrorist groups or sympathisers in or outside the UK
- Unexplained source of wealth that is not in proportion to the client circumstances

13. Suspicious Activity Reports (SAR)

If there are any concerns, as laid out in Section 12, it must be reported to the Nominated Offer.

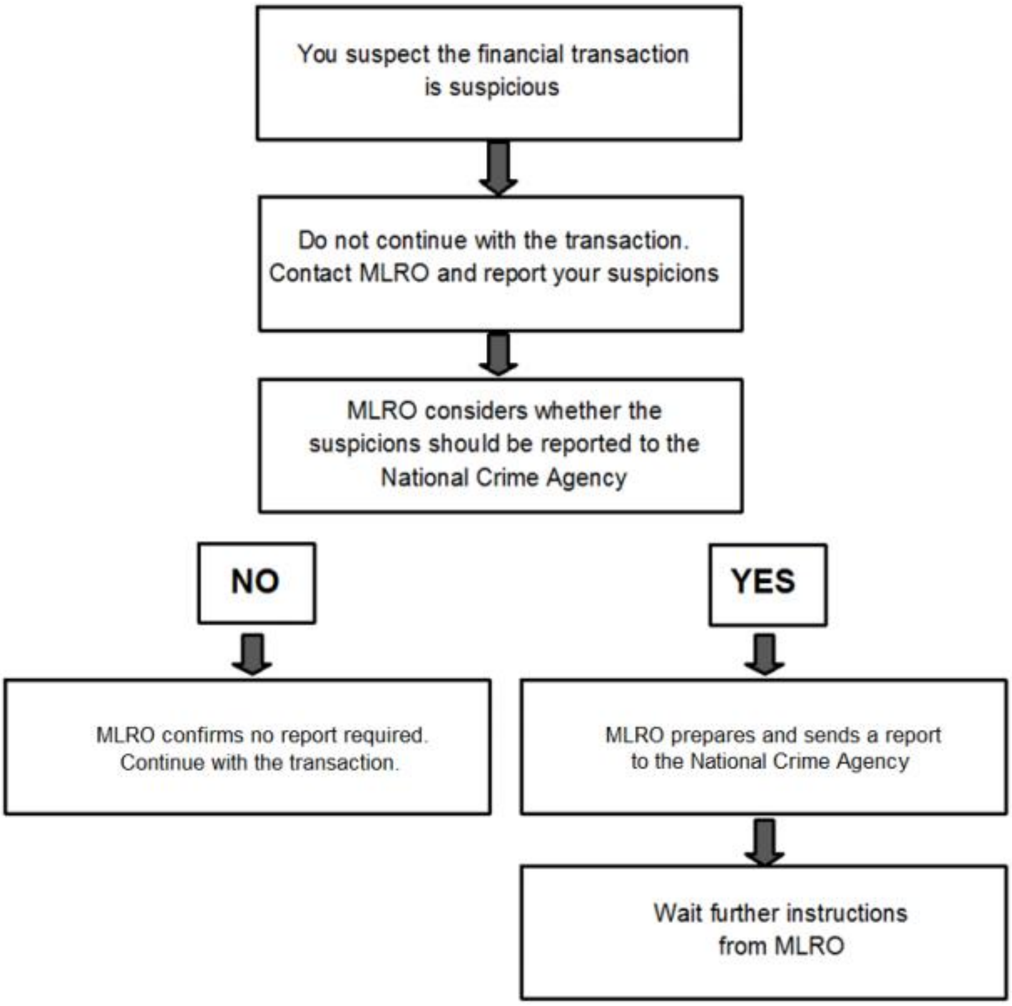
Suspicious Activity Report:
The NCA can be contacted on 020 7238 8282 to request consent. However, the NCA prefer reports to be made using their online reporting system:

SAR Portal/Landing Page

To login go to:
User ID:
Password:

Timescales:
The flowchart below outlines the timescales and processes that need to be followed by our business when a report is made to the NCA. The NCA tries to respond to such a request within 48 hours.

13.1 Suspicious Activity Reporting Flowchart



14. Staff Training

Staff training takes place on a annual basis, in line with the requirements within the Money Laundering Regulations 2017.

The training we undertake is a mixture of internal training from the Nominated Officer, as well as external sources who provide video content on the regulations and online questionnaires.

Records of training for all employees that undertake the training are retained.

APPENDICES

APPENDIX 1 Risk Profile of Business

Blake & Thickbroom is a Estate Agency and Lettings business with 2 branches acting for clients in Clacton and surrounding areas settings and we only market properties within approximately a 7 mile radius. We don't deal with foreign properties, commercial units, beach huts.

The typical properties for our business fall within the value range of £1million pounds and typically we would not be and have never been instructed to sell properties valued at over £1million pounds.

The majority of our clients are either/both 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.

As a Sales & Lettings business, the average rent per calendar month (PCM) we let out properties for is £1,200.00. The highest historical rent PCM in our trading area, we have let is £1,500.00 and the highest we are aware of in our trading region is £2,500.00. We would therefore not be exposed to rental properties above the €10,000 (circa £8,500) threshold.

We are instructed by UK businesses, such as property developers, solicitors, banks or other estate agents or repossession companies who we know well and have good working relationships with.

We don't accept instructions from any person who we know is on the UK financial sanctions list (WWS). We will check every Seller, Buyer, Landlord, Tenant and Guarantor against the current UK financial sanctions list.

We accept payments from sellers or buyers for services we provide, which will be paid 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 client's 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 (almost) 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

To deal with the Money Laundering risks, we have outlined our risk assessment in Section 6 that we ask our staff to refer to when assessing the risk a Seller or Buyer pose. Then apply the appropriate risk on the Landmark Agent system when running an electronic check to complete the customer due diligence.

Appendix 2

Training Record

Date	Training Undertaken by? (External/Internal)	Attendees
13/04/2026	Refresher course on AML Landmark	Paul Collins
09/04/2026	Refresher course on AML Landmark	Steve Thickbroom
13/04/2026	Refresher course on AML Landmark	Julie challis
14/04/2026	Refresher course on AML Landmark	Tracey Blake
14/04/2026	Refresher course on AML Landmark	David Allis
17/04/2026	Refresher course on AML Landmark	Jack Thickbroom
17/04/2026	Refresher course on AML Landmark	Joseph Thickbroom

<u>Audit Notes for Annual Review dated :</u>

We have carried out an audit on our internal procedures which was resulted in finding that our AML policy has not been revised recently. We have now taken steps to remediate this and have created a new up to date policy document and set up a system, that staff training and our policy document will be reviewed on an annual basis.

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Vendors

If the individual has not been met, the risk assessment will automatically provide a high risk outcome.

Selling	1	2	3	5
Has a representative from your company met this individual?	We have met this individual at the property	We have met this individual in branch (or at another location)		We have not met this individual
Where is this individual resident?	UK National in UK	Foreign National in UK/ UK National outside UK	Foreign National outside UK	
Is the transaction unusually complex or unusually large given the nature of the customer, property, and transaction?	No		Yes	
Is the transaction being conducted through a third party?	No		Yes	
Have you verified property ownership?	Owner/s verified via Land Registry check, or Owner/s verified via Scottish Title check	Satisfied with visual inspection or Owned by third party (Trust/Company/Probate /Executory)	No	
Are there any other concerns or complications in the transaction?	No	Some concern	Further investigation required	

Risk Ranking	Normal Risk 1-8	High Risk 9+

Landmark
Estate Agency Services

Buyers

If the individual has not been met, the risk assessment will automatically provide a high risk outcome.

Purchasing	1	2	3	5
Has a representative from your company met this individual?	We have met this individual at the property	We have met this individual in branch (or at another location)		We have not met this individual
Where is this individual resident?	UK National in UK	Foreign National in UK/ UK National outside UK	Foreign National outside UK	
Is the transaction unusually complex or unusually large given the nature of the customer, property, and transaction?	No		Yes	
Is the transaction being conducted through a third party?	No		Yes	
How is the purchase being funded?	**Mortgage with own funds** Mortgage + Savings Mortgage + Savings + Gifted Deposit Mortgage ONLY **Sale of another property** Sale of another property + Mortgage Sale of another property + Savings Sale of another property +Mortgage + Savings Sale of another property ONLY **Help from family or third party** Gifted deposit + Mortgage Gifted deposit + Savings Gifted deposit + Savings + Mortgage Gifted deposit + Inheritance	**Mortgage with own funds** Mortgage + Inheritance Mortgage + Inheritance + Savings **Help from family or third party** Gifted amount for full purchase **Business or complex funds (including overseas)** Business income + Mortgage Business income + Savings Business income + Mortgage + Savings	**Cash Buyer** Savings ONLY Savings + Inheritance Sale of another property + Savings **Business or complex funds (including overseas)** Business income + Overseas funds	**Cash Buyer** Overseas funds + Savings Overseas funds + Inheritance Overseas ONLY **UNKNOWN** Funding of purchase is unknown **Business or complex funds (including overseas)** Overseas funds
Are there any other concerns or complications in the transaction?	No	Some concern	Further investigation required	

Risk Ranking	Normal Risk 1-8	High Risk 9+

Company

There is no numeric scoring system for the company risk assessment.
If 1+ high risk answer is provided, the overall outcome is a HIGH.

Company Risk Assessment	Normal Risk	High Risk
Based in UK?	Yes	No
Solely operate in UK?	Yes	No
Nominee shareholders	No	Yes
Unusually complex?	No	Yes
Unusual/suspicious transaction?	No	Yes

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Estate Agency Services

Lettings (Landlords)

If the individual has not been met, the risk assessment will automatically provide a high risk outcome.

Lettings - Landlord	1	2	3	5
Has a representative from your company met this individual?	We have met this individual at the property	We have met this individual in branch (or at another location)		We have not met this individual
Where is this individual resident?	UK National in UK	Foreign National in UK/ UK National outside UK	Foreign National outside UK	
Is the rent £10,000 or more per month, or is any single payment being made over this amount?	No		Yes	
Is the transaction being conducted through a third party?	No		Yes	
Have you verified property ownership?	Owner/s verified via Land Registry check	Satisfied with visual inspection or Owned by third party (Trust/Company/Probate /Executory)	No	
Are there any other concerns or complications in the transaction?	No	Some concern	Further investigation required	

Risk Ranking	Normal Risk 1-8	High Risk 9+

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Lettings (Tenant/Guarantor)

If the individual has not been met, the risk assessment will automatically provide a high risk outcome.

Lettings - Tenant	1	2	3	5
Has a representative from your company met this individual?	We have met this individual at the property	We have met this individual in branch (or at another location)		We have not met this individual
Where is this individual resident?	UK National in UK	Foreign National in UK/ UK National outside UK	Foreign National outside UK	
Is the rent £10,000 or more per month, or is any single payment being made over this amount?	No		Yes	
Is the transaction being conducted through a third party?	No		Yes	
How are the rental payments being funded?	Independently	A third party (e.g. family member)	Company or other source	
Are there any other concerns or complications in the transaction?	No	Some concern	Further investigation required	

Risk Ranking	**Normal Risk 1-8**	**High Risk 9+**

Landmark
Estate Agency Services

Simplified Due Diligence

Simplified due diligence is applicable to selected types of organisations, typically where they already subject to AML supervision, publicly owned or listed on the stock ecxhange. The principle being that these types of organisations are more straightforward to deal with due to the regulation they follow and/or visibility of their structure.

Examples

- Public Authority or Publicly Owned Body (e.g. Local Authority, Government departments)
- Companies listed on the stock exchange
- Banks, Building Societies (financial institutions already subect or AML supervision in the UK, or an equivalently regulated country)
- Pension Scheme (that does not allow assisgnments of interest)
- Beneficial owners of pooled accounts held by a notary or independent legal profession, provided information on the identity of the beneficial owners is available on request