



Mansion House Property Finance Ltd trading as MH Relocations

## **Anti-Money Laundering Policy**

### **Introduction**

Mansion House Property Finance Ltd trading as Mansion House Relocations is committed to ensuring that it has adequate processes in place to reduce its risks from potential client money laundering activities and terrorist financing activities, as outlined in The Money Laundering and Terrorist Financing (Amendment) Regulations 2019.

### **Registration**

Mansion House Property Finance Ltd trading as Mansion House Relocations have completed the registration process with HMRC Anti-Money Laundering Supervision.

Our Company Registration Number is: XAML00000172640

A copy of our proof of registration with HMRC (Confirmation email from HMRC) can be requested by contacting us via email: [dionne@mhrelocations.co.uk](mailto:dionne@mhrelocations.co.uk).

### **Money Laundering Reporting Officer (MLRO)**

Mansion House Property Finance Ltd trading as Mansion House Relocations nominated Money Laundering Reporting Officer (MLRO) is: [Dionne Hall dionne@mhrelocations.co.uk](mailto:dionne@mhrelocations.co.uk). Their responsibility is to assess any suspicions and then make a decision as to whether further due diligence is needed or a report should be made to The National Crime Agency (NCA). If it is decided that a report must be made it is the responsibility of our MLRO to file the report with The NCA.

### **What is Money Laundering?**

The Money Laundering Regulations ensure that business sectors, which may be at risk of being used to launder money, have the necessary controls in place to identify when money laundering may be taking place, how to deal with any 'suspicious activity' and if thought necessary to do so, report the suspicions to the appropriate authorities.

The act of money laundering is a process by which criminals or terrorists move money through the purchase or exchange of other assets; including property and this 'cleans' the cash leaving no obvious links to the 'criminal origins' of such monies.

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Revised 26/05/2023 DH

As an estate agency type business we are at 'High Risk' of such criminal activity. These processes are there to minimise any risk that may be posed to a business. Adherence to the "Due Diligence" identification procedures on every occasion will mitigate the risks of the business being used to launder money or fund terrorism.

## **Risk Assessment**

As an estate agency type business we operate in a relatively 'high risk' sector and due to this we operate a 'Two Tier' risk assessment process to identify our clients as either 'Low' or 'High' risk. We then select the appropriate Client Identification and Due Diligence Process outlined below.

## **Client identification and Due Diligence - Seller & Buyer**

Mansion House Property Finance Ltd trading as Mansion House Relocations operate a risk-based approach and we do identify criteria that may indicate a higher risk of money laundering.

Our risk-based approach assesses the risk of client's laundering money through our business activities and whilst we accept that the majority of our clients will not launder money, we must identify criteria that would indicate a higher risk of money laundering.

Should a face-to-face meeting not take place then our enhanced due diligence procedure will be adopted. This includes asking for additional information or evidence to establish the client's identity, and ensuring that any documents supplied are certified.

### Buyer

Mansion House Property Finance Ltd trading as Mansion House Relocations will collect data relevant to the level of risk posed by any individual client, which will include manually collecting sufficient information to show:

- The Buyer is who they say they are - Gathering copies of Passports/Driving Licenses
- The Buyer lives where they say they live - Gathering copies of Utility Bills < 3 Months old
- They have the funds to make any purchase - Gathering copies of appropriate account statements
- They can provide an audit trail to show the 'source of their funds' to be used for any purchase - Will vary dependent on source of funds

### Seller

Mansion House Property Finance Ltd trading as Mansion House Relocations are direct to the Seller we will collect data relevant to the level of risk posed by any individual client, which will include manually collecting sufficient information to show:

- The Seller is who they say they are - Gathering copies of Passports/Driving Licenses
- The Seller lives where they say they live - Gathering copies of Utility Bills < 3 Months old
- They have the legal right to sell the property or site - Land Registry Checks and/or Proof of Power of Attorney

If you would like more detail about our Full Seller (Direct to & Via 3<sup>rd</sup> Party Agent) & Buyer (Individual) Due Diligence Processes, you can request a copy via email: [dionne@mhrelocations.co.uk](mailto:dionne@mhrelocations.co.uk)

### When the client are not private individuals

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Mansion House Property Finance Ltd trading as MH Relocations  
Registered in England and Wales under company registration number 04799482. Registered office  
address: Suite 1161 Unit 3a, 34-35, Hatton Garden, London, England, EC1N 8DX. Data Protection  
Reg: **ZA911712** The Property Ombudsman Reg: TO6705

Revised 11/02/2022 DH

For clients who are not private individuals, such as corporate clients and private companies, Mansion House Property Finance Ltd trading as Mansion House Relocations will obtain information that is relevant e.g. company registration number, registered address and evidence that the individuals have the authority to act for the company – a search at Companies House will reveal details of directors and company secretary.

The above requirements for documentation will be applied to all shareholders holding 25% or more of a business.

If you would like more detail about our Full Buyer Due Diligence (Company) Process, you can request a copy via email: [dionne@mhrelocations.co.uk](mailto:dionne@mhrelocations.co.uk).

Mansion House Property Finance Ltd trading as Mansion House Relocations uses Compliance Assist electronic checking system to carry out appropriate level checks on Sellers and Buyers.

#### Verifying an individual's identity electronically

The Compliance Assist system uses Experian's data and checks multiple data sources including:

- Identity – Name & DOB
- Address – Time at Address
- Politically Exposed Persons (PEP's)
- The Sanctions List
- Land Registry

Compliance Assist offers a 'Low' or 'High' Risk setting for electronic checks in line with HMRC expectations and provides a detailed report which is kept on record.

## **Staff Training**

Mansion House Property Finance Ltd trading as Mansion House Relocations ensure that all staff members upon joining the Company and annually thereafter receive training to an appropriate standard dependent on their individual job roles.

The training level is reviewed should their role change.

We hold staff training records to monitor training needs, assess any potential shortfalls in training and the effectiveness of any training given to staff members.

## **Record Keeping/Storage**

Examples of Client records should be kept for 5 years after the business relationship has ended:

1. Any evidence obtained to prove a client's identity, address, proof of funds or source of funds, including results from any electronic checks carried out.
2. Any supporting records relating to a client relationship or occasional transaction, such as communications etc.

Mansion House Property Finance Ltd trading as Mansion House Relocations will ensure that all of your personal information will be held in a secure manner and in line with guidance from the Information Commissioners Office (ICO)

If you would like more information about how we will hold your personal data you can access a copy of our full Data Privacy Policy:

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## Reviews and Controls

It is the policy of Mansion House Property Finance Ltd trading as Mansion House Relocations to review the Anti-Money Laundering Policy at least annually or when the regulations are updated or there is a change in interpretation.

## Suspicious Activity Reporting

**WARNING:** We will report all suspicious activity to The National Crime Agency (NCA)

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