

MONEY LAUNDERING POLICY

We are Sanctuary Property Sourcing Limited ('We', 'Us', 'Our') and We take responsibility in complying with the Money Laundering Regulations 2007 ('the Regulations') to take active steps to combat money laundering and terrorist financing risk. In complying with the Regulations, this Policy outlines Our policy to check that Our clients are who they say they are and in line with this We have implemented internal controls and monitoring systems.

Dependent on the type of client, We may at Our absolute discretion either carry out a standard level of due diligence or enhanced due diligence where Our MLRO may request information over and above that set out below.

IDENTIFICATION OF CLIENTS

We carry out client due diligence and take the following steps to identify Our clients so that We can satisfy Ourselves that they are who they say they are. We therefore require each client to provide Us with the following details (where applicable) and documentary evidence reasonably requested by Us from time to time to support this:

- Full name(s);
- Date of birth;
- Corporate identification numbers (e.g. registered company number);
- Residential address;
- Registered or main business address; and
- Photographic identification

Where the client is a corporate entity for example, then We may require some of the details listed above to be provided to Us in respect of the entity's management (e.g. directors and trustees) and beneficiaries (e.g. any and all shareholders, members and persons of significant control). As a general rule of thumb a beneficiary will be the person who is behind the client and who either owns or controls the client (i.e. on whose behalf Our services are provided to).

In the event that We deal with any individual within a corporate entity that is not a director or controlling shareholder then We will require the written consent of a director or controlling shareholder in order to deal with that individual on behalf of a Client.

Please note that we may carry out an electronic verification check in relation to any documentation provided to Us in this manner. We may also take steps to verify the answers to any questions that We ask of a client as part of the due diligence process and for the avoidance of doubt this may involve third parties.

If We have any doubts as to a client's identity, We reserve the right to cease to deal with them.

ESTABLISHING A BUSINESS RELATIONSHIP

As We are entering into relationships with Our clients of a business nature, We need to obtain information on the purpose and intended nature of the relationship including where the client's funds come from and this may include obtaining:

- Details of the client's business or employment;
- The source and origin of funds to be used by the client;
- Copies of recent financial statements;
- Details of relationships between signatories and beneficiaries; and
- The expected level and type of activity that will take place in the relationship

CHANGING CIRCUMSTANCES

Clients should be aware that We need to keep up-to-date information on them and We may therefore require to take the steps identified in sections (a) & (b) above in the event that the client's circumstances change (be it a change in the type of business activity or their beneficial structure).

REPORTING

For the protection of all Our clients We operate an anti-money laundering reporting procedure. Any information that is provided during the course of providing Our services to a client will be treated in the strictest confidence and information will only ever be disclosed in line with Our Privacy Policy and therefore with your consent.

One of the exceptions to this rule is under the Proceeds of Crime Act 2002 ('the Act') where We are required to notify the Serious and Organised Crime Agency of any matters, which come to Our knowledge, which are in contravention of this Act. It is a requirement of the Act that this information would be supplied without reference to Our client.

We reserve the right to make additional charges to Our clients as a result of any work We are obliged to undertake in compliance with the Act including any necessary application to court for guidance on how to deal with such information in compliance with the Act.



PROPERTY
SOURCING
COMPLIANCE

CASH

Please note that as a result of the Regulations and the internal policies, which We have adopted to combat money laundering, We are not able at any stage to accept payments in cash in excess of £500.

INTERNAL PROCESSES

We have implemented internal controls and monitoring systems and have a commitment to training Our employees so that they're aware of their responsibilities with regards to money laundering and compliance with this policy. We have an internal money laundering policy and compliance with this will be monitored by Our MLRO.

In compliance with carrying out due diligence under the Regulations, We maintain comprehensive records, including keeping either originals or copies of:

- Client identification documents;
- Daily records of transactions;
- Receipts;
- Cheques; and
- Correspondence

These documents will be kept for a period of at least five years from the date on which a business relationship with a client ends.



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