

# Anti-Money Laundering Policy

It is the policy of Broomfield Estates ie BE that all members of staff at all levels shall actively participate in preventing the services of Broomfield Estates from being exploited by criminals and terrorists for money laundering purposes. This participation has its objectives:

- Ensuring Broomfield Estates compliance with all applicable laws, statutory instruments of regulation, and requirements of Broomfield Estates supervisory authority (HMRC)
- Protecting Broomfield Estates and all its staff as individuals from the risks associated with breaches of the law, regulations and supervisory requirements
- Preserving the good name of Broomfield Estates against the risk of reputational damage presented by implication in money laundering and terrorist financing activities
- Making a positive contribution to the fight against crime and terrorism.

**To achieve these objectives, it is the policy of Broomfield Estates that:**

- Neither commercial considerations nor a sense of loyalty to clients shall be permitted to take precedence over Broomfield Estates anti-money laundering commitment.
- Broomfield Estates have appointed a board level director to be responsible for anti-money laundering compliance. Broomfield Estates have notified the supervisory authority and supplied the name of the responsible director.
- Broomfield Estates have appointed a Money Laundering Reporting Officer (MLRO) and informed the supervisory authority of their name. Broomfield Estates have appointed a deputy to cover the absence of the MLRO. The MLRO and deputy shall be afforded every assistance and co-operation by all members of staff in carrying out the duties of their appointments.
- Broomfield Estates have carried out a business-wide assessment of the risks of money laundering and terrorist financing to which Broomfield Estates is subject, and have designed and implemented appropriate controls to mitigate and manage effectively the risks identified.
- Broomfield Estates have established and maintained documented, proportionate policies and procedures including controls, which outline the positive actions to be taken by staff to prevent money laundering and terrorist financing in the course of their work. The MLRO shall keep these under review to ensure their continuing appropriateness.
- To comply with HMRC's regulations, all Broomfield Estates staff are regularly and continually trained on Money Laundering / Terrorist Financing / Criminal Finances Act.
- Documentary evidence is required for both Vendors and Purchasers. Production of original documents is the preferred option, however we can accept certified copies.

**Below is a list of acceptable documents (for individuals), and where and how, these can be certified:**

- Passport
- Photo-Card Driving Licence - can be used as photo-id or proof of address – not both
- National ID Card
- Council Tax Demand
- Utility Bill – no more than 3 months’ old (mobile phone bills are not acceptable)
- Current Bank Statement or Credit Card Statement can be accepted; only if issued by a regulated financial sector firm in the UK or the EU (if online document it must be a PDF)

**Below is a list of people who can certify your documents:**

- bank or building society official
- councillor
- minister of religion
- dentist / doctor
- chartered accountant
- solicitor or notary
- teacher or lecturer
- Post Office

**The person you ask must not be:**

- related to you
- living at the same address
- in a relationship with you

**The certification should be as follows:**

The third party must have seen the original and must write above their signature that the copy is a true replica of the original and (if applicable) that the photograph bears a true likeness. They must print their name, state their capacity, contact details and the date of signature. A company stamp is desirable, but not essential, unless from a solicitor’s or accountancy practice. The solicitor should also print their name and SRA number.

**Deposits and / or Financial Gifts**

We have a legal obligation to trace and verify the origin of all deposits and / or financial “gifts”, as well as verifying the identity of all those providing the gift.