Anti-Money Laundering Policy

Applies to	All employees
Policy owner	Chief Operating Officer
Version	2.1 revision to include funds returned to original source (new section 5)
Last reviewed	23/09/2026
Next review	20/07/2027

Anti-Money Laundering (AML) policies are an essential component of any business's risk management and compliance strategy. An effective AML policy can help prevent the use of a business' financial services for criminal purposes, including money laundering, terrorist financing, and other illegal activities.

This policy does not form part of your contract of employment. We reserve the right to amend it.

1. Introduction

Money Laundering is the process by which criminally obtained money or other criminal property is exchanged for “clean” money or other assets with no obvious link to their criminal origins. The term is used for a number of offences involving the integration of “dirty money” (i.e. the proceeds of crime) into the mainstream economy. The aim is to legitimise the possession of such monies through circulation and this effectively leads to “clean” funds being received in exchange.

The Money Laundering Regulations (MLR) apply to a number of different business sectors, including accountants, financial service businesses, estate agents and solicitors. Anstey Horne does not fall into any of the sectors that require supervision by HMRC, which are as follows:

- money service businesses not supervised by the Financial Conduct Authority (FCA)
- high value dealers
- trust or company service providers not supervised by the FCA or a professional body
- accountancy service providers not supervised by a professional body
- estate agency businesses
- bill payment service providers not supervised by the FCA
- telecommunications, digital and IT payment service providers not supervised by the FCA
- art market participants
- letting agency businesses

Whilst we are not directly covered by the requirements of the MLR we should comply with the underlying spirit of the legislation and regulations.

We are committed to preventing money laundering and complying with all applicable laws and regulations related to anti-money laundering (AML). This policy outlines our commitment to detecting and preventing money laundering and other financial crimes.

2. Policy statement

We are committed to maintaining an effective AML program to prevent, detect, and report suspicious activity that may be indicative of money laundering, terrorist financing, or other financial crimes. This policy is designed to comply with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

3. Cash payment procedure

Cash should not be accepted in payment for our services except in exceptional circumstances. If cash is offered as payment written authority must be sought from one of the Senior Directors before it is accepted. Cash payments in excess of £1,000 should not be accepted in any circumstances.

If payment by cash is authorised by a Senior Director employees should request and inspect identification. This will help to identify and report any suspicious transactions. Acceptable identification is a full national passport, driving licence with photo, pension book or Armed Forces ID Card.

Electronic or cheque payments are easily traceable through the banking system. As traceability is key and an individual walking in to pay a debt with cash is not necessarily traceable, it is best practice to insist on payment electronically from a UK Clearing Bank.

4. Customer due diligence (CDD)

We require only the most basic identity checks (e.g. written instructions on the organisation in question's headed paper or email at the outset of a particular matter).

The following factors suggest these minimum level checks are appropriate for the business:

- For Party Wall matters, our advice is in respect of construction related activities for UK properties. Our advice does not directly relate to transactions involving the acquisition or disposal of an asset.
- For Rights of Light matters, our advice is in respect of development related activities for UK properties. Our advice does not directly relate to transactions involving the acquisition or disposal of an asset.
- For Building Consultancy Services, our advice is in respect of the management, refurbishment or inspection of UK owned properties. Our advice does not directly relate to transactions involving the acquisition or disposal of an asset.

5. Client funds and return to source

Where Anstey Horne receives or holds funds on behalf of a client or other party, the funds must only be received and held for a legitimate purpose connected with the professional services being provided. The identity of the payer and the purpose of the payment should be recorded so that the source and movement of funds can be traced.

Any client funds that are subsequently returned or refunded must, wherever possible, be returned to the same bank account from which the funds originally originated. Client funds must not be returned to a different bank account merely at the client's request without further verification and approval.

Where return to the originating bank account is not possible, for example because the account has been closed, the reason must be documented. The replacement account must be verified as belonging to the client or other person entitled to the funds, and the payment must be approved in writing by a Senior Director before release. Any unexplained request to redirect funds to another person, third party or unrelated bank account must be treated as a potential money laundering or fraud warning sign and referred in accordance with section 6 below before any payment is made.

6. Reporting suspicious activity

We will report any suspicious activity to the appropriate authorities, in compliance with all applicable laws and regulations.

7. Training and awareness

We will provide training and awareness programs for all employees on AML policies, procedures, and regulations. This training will be provided periodically to ensure that employees understand their obligations and the importance of AML compliance.

8. Internal controls

We will maintain appropriate internal controls to ensure the effectiveness of our AML program. These controls may include policies and procedures, risk assessments, record-keeping requirements, and reporting procedures.

9. Program review and update

We will periodically review and update our AML program to ensure its continued effectiveness and compliance with applicable laws and regulations.

10. Conclusion

Anstey Horne is committed to preventing money laundering and other financial crimes through our AML program. We will continuously review and improve our policies, procedures, and controls to ensure compliance with all applicable laws and regulations.

11. Questions and administration

The Chief Operating Officer is responsible for administering this policy. If you have any questions, please speak to your line manager in the first instance or contact stevewalsh@ansteyhorne.co.uk

Related policies: Anti-Bribery Policy – Code of Ethics - Whistleblowing Policy

This policy does not form part of any contract of employment.