

Anti-Money Laundering Policy

Harris & K Properties Ltd is subject to the Money Laundering Regulations 2017, aimed at countering money laundering and financing of terrorism. We are legally required to obtain identification and proof of address from all our customers, including homeowners, buyers, landlords, and tenants. We also identify other beneficial owners involved in the transactions.

We adopt a risk-sensitive approach to recognize and prevent fraudulent transactions, using criteria-based systems to assess the risk of money laundering.

How We Manage the Risk

We have a nominated Money Laundering Reporting Officer (MLRO) and Deputy Officer. The MLRO, handles reports of suspicious activity and submits Suspicious Activity Reports (SAR) to the National Crime Agency when necessary.

Identification Process

To mitigate money laundering risks, we conduct Customer Due Diligence (CDD). All landlords, tenants, vendors, and buyers must provide photographic ID and proof of address. Landlords and sellers also need to provide proof of ownership. Documents must be witnessed by our staff, with copies retained. If original IDs are not available, copies must be certified by a solicitor or post office. Verification checks are required for all individuals involved in the transaction. Payments must be made to accounts in the customer's name, and additional documentation may be required based on individual circumstances.

Individual Identity Documents

Customers must provide one document from List A and one from List B:

- **List A – Identity Document**
 - Current signed passport
 - Current UK/EU photo driving licence
 - Resident permit issued to EU nationals by the Home Office
 - Inland Revenue tax notification
 - State pension or benefits book/notification letter
- **List B – Proof of Address**
 - Current UK/EU photo driving licence (if not used in List A)
 - Council tax bill
 - Benefits entitlement letter
 - Local authority rent card
 - Tenancy agreement
 - Bank statement
 - Utility bill from the last three months
 - Telephone bill (excluding mobile pay-as-you-go)
 - Home or motor insurance certificate
 - NHS medical card or letter from GP confirming registration
 - Police registration certificate
- **List C – Proof of Ownership**
 - Most recent mortgage statement
 - Home or motor insurance certificate
 - Solicitors letter confirming house purchase/deeds/land registration

Probate

If acting as a representative of an estate, we require:

- Grant of probate (if a will was left)
- Letter of administration (if no will was left)
- Individual identity evidence from List A & B for the personal representative

Limited Company

For representatives of a UK company, we require:

- Certificate of incorporation
- Articles and memorandum of association
- Latest annual return or confirmation statement with details of current officers
- Nominee director declaration and general power of attorney (if offshore)
- Individual identity evidence from List A and B for major shareholders

Offshore Company

For representatives of an offshore company, we require:

- Certificate of incorporation
- Articles and memorandum of association
- Latest annual return with details of current officers
- Share certificate(s) showing the ultimate beneficial owner or certificate of incumbency
- Nominee director declaration and/or general power of attorney (if applicable)
- Individual identity evidence from List A and B for major shareholders

Trust

For representatives of a trust, we require:

- Trust deed
- List of trustees and beneficiaries
- Individual identity evidence from List A & B for those with a vested interest

Suspicious Activity Reporting

If we suspect money laundering or terrorist financing at any transaction stage, we are legally obliged to submit a Suspicious Activity Report (SAR) to the National Crime Agency. Suspicious activities may include:

- Long-distance transactions without property viewings
- Transactions below market value
- Reluctance to provide identification
- Delaying contract signing or providing ID
- Requesting us to hold cash deposits
- Cash settlements
- Use of intermediaries to hide identities
- Overseas funds transfers
- No clear reason for using our agency
- Late changes to involved parties
- Significant unexplained financial improvements
- Reluctance to disclose the source of funds

Additional PEP & Adverse Media Checks

We check against the HM Treasury sanctions list for politically exposed persons (PEPs) and conduct adverse media screening using public information. We document assessments and decisions, ensuring news is from reputable sources.

Records Retention

Our data controller regularly reviews the stored customer data to determine its necessity. We keep records and supporting documents for the current tax year plus five years after the most recent transaction.

For more information or to discuss AML, please email g.basher@harrisandk.co.uk