Anti-Money Laundering (AML) Policy Statement

My Property Listing is committed to conducting its business with integrity, transparency and in full compliance with all applicable legal and regulatory obligations. We recognise that the property sector is vulnerable to money laundering, terrorist financing and other forms of financial crime. We are committed to preventing our services from being used for criminal purposes by maintaining robust Anti-Money Laundering (AML) controls and, where appropriate, reporting suspicious activity to the relevant authorities, including the National Crime Agency (NCA).

As part of this commitment, My Property Listing complies with all applicable UK anti-money laundering legislation and guidance, including the Proceeds of Crime Act 2002, the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended), the Terrorism Act 2000, the Bribery Act 2010, and all relevant guidance issued by HM Revenue & Customs (HMRC).

Our AML requirements apply to all customers and business relationships, including sellers, buyers, landlords, tenants, corporate entities, beneficial owners, introducers and any other parties where Customer Due Diligence (CDD) is required.

Before establishing a business relationship or carrying out a regulated transaction, we are required to verify the identity of our customers and, where applicable, any beneficial owners or individuals exercising control over a corporate entity. Depending on the nature of the transaction, we may also request evidence of ownership, source of funds, source of wealth and other supporting documentation to satisfy our legal obligations.

Identity verification is carried out using secure electronic verification systems and other reliable independent sources where appropriate. Where satisfactory evidence cannot be obtained, or where we are unable to complete the required due diligence, My Property Listing reserves the right to refuse to act or to terminate the business relationship.

Customer Due Diligence records and supporting documentation are retained in accordance with the Money Laundering Regulations and our Record Retention Policy. Information is held securely and processed in accordance with applicable data protection legislation.

My Property Listing is registered with and supervised by HM Revenue & Customs (HMRC) for compliance with the Money Laundering Regulations. If you have any questions regarding our Anti-Money Laundering procedures, please contact us at ***compliance@mypropertylisting.co.uk.***

My Property Listing AML Guidelines

This policy sets out the procedures for corporate Anti-Money Laundering (AML) due diligence. Individual AML, identity verification, and sanctions screening are carried out through Sumsub.

Corporate AML Due Diligence Procedure

The following procedure should be followed when completing Anti-Money Laundering (AML) due diligence for corporate clients.

1. Search for the company on the Companies House register using the company number provided by the client.
2. Verify that the company name and registration number match the information supplied by the client.

3. Create a new Corporate Customer Due Diligence (CDD) form and save it using the company name.
4. From the **Overview** section of Companies House, record the following information in the CDD form:
    - Company name & company registration number
    - Registered office address
5. Navigate to the **Officers** section and filter for **Current Officers**.
6. Record the names of all current directors in the CDD form under **Individuals authorised to act on behalf of the company**.
7. Save a PDF copy of the current officers list for the AML file.
8. Navigate to the **Persons with Significant Control (PSC)** section and save a PDF copy of the information displayed.
9. If a PSC is another corporate entity, repeat the process for that entity until the ultimate beneficial owners (named individuals) are identified, or until Companies House confirms that there are no registrable Persons with Significant Control.
10. Navigate to the **Filing History** section.
11. Filter by **Incorporation** and download the Certificate of Incorporation. Save this to the AML file.
12. Review the incorporation documents to identify the original shareholders and issued share capital.
13. Filter by **Confirmation Statements** and identify the latest statement reflecting the current ownership position.
14. Where ownership has changed since incorporation, review the relevant confirmation statements and, where necessary, filings relating to share capital or allotments to establish the current ownership structure. Save all relevant documents to the AML file.
15. Record the current shareholding structure in the CDD form, including each shareholder's ownership percentage where applicable.
16. Identify the individuals who require AML verification in accordance with the company's ownership and control structure, and update the CDD form accordingly.
17. Ensure the completed CDD form and all supporting documentation (including Companies House records and downloaded PDFs) are saved within the client's AML file before submitting the case for review.

Corporate Customer Due Diligence (CDD) Form

A Corporate Customer Due Diligence (CDD) Form must be completed for all corporate clients before a business relationship is established or a transaction is undertaken.

The purpose of the form is to document the firm's verification of the company's identity, ownership and control structure, assess the level of money laundering risk, and determine the appropriate level of due diligence required.

The Corporate CDD Form should be completed alongside the Customer / Beneficial Owner Risk Assessment Form and must include, where applicable:

- The company's full legal name, registration number and registered office address.
- The identity of the individual authorised to act on behalf of the company and their position.
- Verification of the company's existence using Companies House or an equivalent official company registry.
- Details of all current directors or equivalent officers.
- Identification of all Persons with Significant Control (PSCs) and Ultimate Beneficial Owners (UBOs), including individuals who own or control more than 25% of the company's shares or voting rights.
- Where ownership is through one or more corporate entities, sufficient evidence to establish the ultimate ownership and control structure.
- Verification of the identity of the authorised representative and all individuals who are subject to Customer Due Diligence requirements.
- Details of the proposed business relationship or transaction, including the property address, transaction value, and the purpose of the transaction.
- Confirmation of whether the customer has been met in person and details of any introducer involved.
- Details of any unusual or suspicious circumstances identified during the onboarding process.
- Consideration of whether Enhanced Due Diligence (EDD) is required.
- An overall customer risk rating (Low, Medium or High), determined in accordance with the firm's Risk Assessment Framework.

The completed form, together with all supporting documentation (including Companies House records, identification documents and screening results), must be submitted to the Money Laundering Reporting Officer (MLRO) or their nominated deputy for review and approval before the business relationship or transaction proceeds.

All completed CDD forms and supporting documentation must be retained in accordance with the firm's record retention policy and the requirements of the Money Laundering Regulations 2017 (as amended).

Accepted Documentation

Below is a list of acceptable identity documents. We require sight of all original or certified documents. Subject to your individual circumstances, Foxtons may liaise with you for further/other documentation.

Customer Type	Required Documents
Individuals	**One proof of identity** and **one proof of address**.

Proof of Identity (List A)	• Current signed Passport • Valid UK Photocard Driving Licence • National Identity Card (EEA or equivalent Government-issued ID)
Proof of Address (List B)	• Bank, Building Society or Credit Union Statement (dated within 3 months) • Credit Card Statement (dated within 3 months) • Mortgage Statement (dated within 12 months) • Utility Bill (dated within 6 months) • Landline or Mobile Phone Bill (dated within 6 months) • Council Tax Bill (dated within 12 months)• Tenancy Agreement (dated within 12 months) • HMRC Tax Notification (dated within 6 months) • Benefits Entitlement Letter (dated within 12 months) • Home or Motor Insurance Certificate (dated within 12 months • Solicitor's Letter confirming a recent property purchase (dated within 3 months) • NHS Letter or Medical Card (dated within 3 months) • Electoral Register Confirmation or Official Poll Card (dated within 12 months) • Police Registration Certificate (where applicable).
Probate / Estate Representatives	• Grant of Probate (where there is a Will) **or** Letter of Administration (where there is no Will) • One proof of identity and one proof of address for each Personal Representative.
UK Limited Companies	• Certificate of Incorporation • Articles of Association (where applicable) • Memorandum of Association (where applicable) • Latest Confirmation Statement showing current directors and shareholders • Details of all Persons with Significant Control (PSCs) and Ultimate Beneficial Owners (UBOs) • Proof of identity and proof of address for all individuals owning or controlling **25% or**

	more of the company, or otherwise exercising control
Overseas Companies	• Certificate of Incorporation • Constitutional documents (or local equivalent) • Latest Annual Return or Company Extract showing current directors and shareholders • Certificate of Incumbency (where applicable) • Ownership structure chart where ownership is through another company • Proof of identity and proof of address for all Ultimate Beneficial Owners (UBOs) and individuals owning or controlling **25% or more** of the company.
Trusts	• Trust Deed • List of Trustees • List of Beneficiaries • Proof of identity and proof of address for all Trustees and any Beneficiaries or individuals exercising control over **25% or more** of the Trust.