

Money Laundering

TFT is committed to the highest ethical standards and good governance as set out by the Royal Institution of Chartered Surveyors, CIBSE and other professional bodies we are aligned with. It has adopted a zero tolerance to all forms of fraud, bribery and corruption, including money laundering. The conduct of Board members, staff, consultants, contractors and suppliers, and others involved, in delivering TFT's business is critical to achieving this.

General rules relating to conduct and disciplinary action are contained within employment terms and conditions and available company policies.

Money laundering can take a number of forms:

- Handling the proceeds of crime
- Direct involvement in criminal or terrorist property activity
- Entering into arrangement which facilitate other people committing laundering of criminal or terrorist property, money or assets
- Investing the proceeds of crime into other financial products or into the acquisition of other property/assets

TFT's policy

TFT is committed to being fully compliant with the provisions of the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002 and anti-terrorism laws.

To ensure compliance with the law and to ensure we know and fully understand the identity and structures of our clients we have robust anti-money laundering policies and procedures in place.

Should reporting be required, the nominated MLRO is the firm's Operations Director.

Client and Due Diligence

We conduct due diligence enquiries on all new clients to establish and verify our clients' identity and the identity of any beneficial owners. We may also undertake such enquiries on anyone instructing us on behalf of, but who may not be our clients. We cannot act if sufficient information is not provided.

We generally require sight of original documentation. We use third party providers who search external electronic databases as part of this diligence process.

We undertake risk assessments for all new instructions for existing clients.

On-going Monitoring

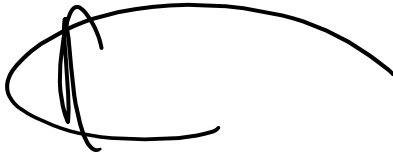
We undertake on-going monitoring of all existing clients (which may require you to provide us with updated proof of identity documentation).

Tipping off

We must report to the National Crime Agency and other relevant authorities any suspicion or knowledge regarding money laundering or the proceeds of crime.

Confidentiality

Our duties to report to the National Crime Agency may take priority over any duty to keep any relevant information and the details of transactions confidential.



Christine Keates Lewis – HR and Operations Senior Director

For and on behalf of Tuffin Ferraby Taylor (TFT) Ltd

1 November 2023