

email: tracey.james@amp-tech.co.uk

## ANTI MONEY LAUNDERING (AML) COMPLIANCE General Policy and Reporting

AMP Technical Services Ltd will comply with:

• The Money Laundering Terrorist Financing & Transfer of funds Regs 2019 <u>The Money Laundering and</u> Terrorist Financing (Amendment) Regulations 2019

• The Proceeds of Crime Act as amended by the serious organised crime and police act 2005<u>The Proceeds of</u> <u>Crime Act 2002 (External Requests and Orders) Order 2005</u>

• THE Terrorism Act 2000 Terrorism Act 2000

AMP TECHNICAL SERVICES Ltd's AML supervisor and reporting officer (MLRO) is Tracey James. The ICB monitor AMP Technical Services Ltd under MLRs and AMP Technical Services agree to adhere to their Professional Conduct Regulations and principles of ethical and professional conduct.

There are two BOOMs (Beneficial Owner, Officer and Manager) who had DBS checks in May 2025, covering the fitness and propriety needs. Any criminal convictions further to this DBS will be declared and any new BOOMS would require a DBS.

## Whistle Blowing;

If an AMP Technical Services Ltd client appears to convene the Money Laundering Regulations 2017, we will call 0203 4057581 which is an ICB confidential line. The whistle blower should complete a money laundering internal report if suspicion arises and hand to MLRO. If we identify a bookkeeping practice that does not appear to be following ML practices, then we will contact: <u>MLRCIT@hmrc.gov.uk</u>

AML online is used to risk assess our financial clients, categorizing them as low, medium or high risk. For medium and high risk clients, extra care must be taken. Amended risk ratings must be fully documented. If our client is rated as High risk, we must apply Enhanced Due Diligence (EDD).

The AML supervisor will carry out annual risk assessments on the practice and on our clients.

When AMP Technical Services Ltd leave a client, backups should be taken to ensure the data is not altered after the final transaction. This information should be kept for 6 years.

## UPDATE:

When considering transactions for AML, look for large cash transactions and odd/non sensical transactions and/or unusual commercial behaviour. If a SAR to the NCA has been made then the suspicious transaction should be suspended, or if the transaction must be continued, a defence against AML must be obtained from NCA to continue with the suspicious transaction.

May 2025