



Technical Services Ltd.

AMP Technical Services Ltd  
2 Garston Park, Ivy Mill Lane  
Godstone, Surrey  
RH9 8NE  
Tel.: 07890810118

email: [tracey.james@amp-tech.co.uk](mailto:tracey.james@amp-tech.co.uk)

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# ANTI MONEY LAUNDERING (AML) COMPLIANCE

## General Policy and Reporting

The purpose of this AML Policy is to set out the company's commitment to preventing money laundering, terrorist financing, and other financial crimes. As a business providing **bookkeeping and engineering consultancy services**, we recognise our responsibility to identify and mitigate risks associated with financial transactions, client engagements, and the handling of financial information.

Our policy applies to employees, directors, contractors/sub-contractors. It is reviewed by the Directors annually.

AMP Technical Services Ltd will comply with:

- The Money Laundering Terrorist Financing & Transfer of funds Regs 2019 [The Money Laundering and Terrorist Financing \(Amendment\) Regulations 2019](#)
- The Proceeds of Crime Act as amended by the serious organised crime and police act 2005 [The Proceeds of Crime Act 2002 \(External Requests and Orders\) Order 2005](#)
- THE Terrorism Act 2000 [Terrorism Act 2000](#)

AMP Technical Services Ltd.'s AML supervisor and reporting officer (MLRO) is Tracey James. The MLRO is responsible for; receiving and assessing internal suspicious activity reports, submitting Suspicious Activity Reports (SARs) to the NCA, maintaining AML records and providing staff training. Examples of SARs include; Unexplained large payments, reluctance to provide identification, requests to structure payments unusually and transactions inconsistent with the client's business. If a SARs is received, the MLRO will; Assess the report, Submit a SAR to the NCA if required and maintain confidentiality and records. Employees must **not** inform the client (no "tipping off"). 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.

The company will conduct proportionate CDD (Client Due Diligence) on all clients before providing services. The following is required for all clients; Full name and contact details, company registration details (if applicable), verification of identity (passport, driving licence, etc.), proof of address, understanding of the nature and purpose of the business relationship. If necessary enhanced due diligence will be applied including; Politically Exposed Persons (PEPs), clients based in high-risk jurisdictions, unusual or complex transactions and cash-intensive businesses.

The company will monitor client activity to ensure; transactions align with expected behaviour, no unusual or suspicious patterns emerge and records remain up to date.

On going monitoring includes: reviewing bookkeeping entries for anomalies, checking engineering consultancy invoices for inconsistencies and assessing unusual payment methods or structures.

May 2026



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All employees involved in bookkeeping or client-facing engineering consultancy work will receive AML training covering; Legal obligations, identifying suspicious activity, reporting procedures and company policies. Training will be refreshed at least every **two years** or when regulations change.

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 contravene the Money Laundering Regulations 2017, we will call 0203 405 7581 which is an ICB confidential line or reporting via email [confidential@bookkeepers.org.uk](mailto:confidential@bookkeepers.org.uk). The whistle blower should complete a money laundering internal report if suspicion arises and hand to MLRO.

AML online in ICB is used to risk assess our financial clients, categorizing them as low, medium or high risk. This is based on client type, services offered, geographic risk and delivery channels. The risk assessment is reviewed annually and recorded on the ICB platform. 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. The company will retain AML-related records for **a minimum of 5 years**, including; CDD documentation, transaction records, SARs and internal reports and training records. Records will be stored securely and accessed only by authorised personnel.

May 2026