

## **ANTI MONEY LAUNDERING**

### **Anti-Money Laundering Policy**

Carigiet Cowen is committed to being fully compliant with the provisions of the Money Laundering, Terrorist Financing & Transfer of Funds (Information on the Payer) Regulations 2017.

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.

### **Client Due Diligence and Monitoring**

We conduct due diligence enquiries on all new clients to establish and verify their 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, a potential or actual client. We cannot act unless sufficient verification information is provided.

We require sight of original documentation as part of this due diligence process. We also undertake risk assessments for all new matters for existing clients.

We undertake ongoing monitoring of all existing clients (which may require us to request updated proof of identity documentation).

### **National Crime Agency**

We will report to the National Crime Agency any suspicion or knowledge regarding money laundering of terrorist financing activity. Where possible, we will report any such suspicion before a transaction is concluded. Our duties to report to the National Crime Agency may take priority over any duty to a client to keep their information and the detail of a particular transaction confidential.

### **Certification**

Carigiet Cowen is now registered for anti-money laundering supervision with HMRC to carry out estate agency work (AMLS Registration No XEML00000134075). The registered premises is Suite 2 Telford House, Riverside, Warwick Road, Carlisle, CA1 2BT.