



ANTI-MONEY LAUNDERING POLICY

1. David Garofalo is the AML reporting officer for the business, who in his absence delegates this to Hannah Wallace.
2. All instructions that come to market with Cooper Wallace will have online Landmark AML check before commencement of marketing along with taking copies of ID and added to CRM system.
3. All buyers are required at the point of offer acceptance will have a Landmark AML check and ID provided and added on CRM which is conducted prior to the sale been confirmed in writing.
4. Every seller and buyer will be checked via Landmark AML, this will be monitored monthly with a random audit on properties.
5. Any buyer or seller who has not been met in person by Cooper Wallace will undertake a facial recognition ID check via Landmark which is provided by Credas.
6. All staff employed by Cooper Wallace will undertake AML training via Rightmove with their online three module advanced AML training.
7. All suspicious activity will be reported to the AML reporting officer for the business who in turn will report this activity to the National Crime Agency.
8. All records of checks are stored on Landmark and any copies of ID are stored electronically for a minimum period of 5 years as per the Government guidelines.