



Anti-Money Laundering Policy Statement

Last reviewed: 23/01/2025

Introduction

This statement sets out the policy adopted by Finance Expert Ltd in response to our obligations to detect and prevent money laundering and terrorist financing taking place through Finance Expert Ltd.

Our commitment to prevent money laundering, terrorist financing and other financial crime comes from our Director and our Regulator.

Our Regulator considers the policy to be a key piece of evidence when assessing how the team are complying with their individual and group responsibilities in relation to the prevention of financial crime.

Industry Sector

We operate in the financial adviser sector providing clients with advice on mortgages and insurance and selecting appropriate products and solutions to meet client objectives.

Our typical clients are personal clients.

We do not hold permission from the Regulator to handle client money so we will not be involved in the placement stage of money laundering. We do recognise there is considerable scope for us to become involved in the layering and integration stages of the money laundering process and we are committed to being vigilant to this risk.

Statutory and Regulatory Requirements

We have arranged our affairs in a way that ensures reasonable compliance with relevant statutory and regulatory requirements as they relate to anti-money laundering and combating of terrorist financing obligations and procedures. We will demonstrate this through our:

- organisational structure;
- allocation of responsibilities and accountabilities to designated persons;
- detailed operational procedures; and
- fulfilment of money laundering awareness training for all staff and specific training for all relevant staff.

Such arrangements are subject to periodic review to ensure that they are responsive to:

- the jurisdictions where we operate;
- changing statutory and legal requirements including changes to the Guidance Notes issued by the Joint Money Laundering Steering Group (JMLSG);
- rules and guidance on anti-money laundering and combating terrorist finance requirements provided in the FCA Handbook, in particular SYSC and FCG Financial Crime Guide: A firm's guide to countering financial crime risks; and
- The UK Government's Serious and Organised Crime Strategy.

Non-compliance with our detailed procedures through deliberate action or through negligence and persistent non-compliance for any other reason are grounds for disciplinary action as long as our training and competency standards as they relate to anti-money laundering procedures have been met.

Responsibilities and Accountabilities

Our Director has overall responsibility for the establishment and maintenance of effective anti-money laundering and combating of terrorist financing systems and controls, and for overseeing and lending support to the role of the anti-money laundering officer.

Our Director receives and considers the Annual Report on anti-money laundering to satisfy himself as to the propriety and effectiveness of our continuing anti-money laundering and combating of terrorist financing arrangements and as to the proper treatment of identified weaknesses on instances of non-compliance.

Anti-Money Laundering Officer

Our Director having sufficient knowledge, competence and authority, will act as the anti-money laundering officer. His deputy will be one of the Mortgage Advisors.

The anti-money laundering officer will be familiar with and fulfil the responsibilities as set out in the FCA Handbook, in particular SYSC, and the JMLSG industry Guidance.

The anti-money laundering officer will have responsibility for:

- the proper and effective operation of anti-money laundering and combating terrorist finance procedures;
- the training and competence of relevant staff who operate such procedures;
- ensuring sufficient resources are available for money laundering prevention; and
- carrying out a review, at least annually, of our anti-money laundering and combating terrorist finance arrangements.

Staff

All staff will be made aware of and recognise their responsibilities with respect to anti-money laundering and combating terrorist finance procedures under the relevant statutes and regulations.

Staff who operate anti-money laundering and combating terrorist finance procedures will be made aware of their specific accountabilities and be subject to an appropriate training and competence regime to ensure the satisfactory fulfilment of their accountabilities and responsibilities. This regime will ensure that appropriate and relevant training takes place with sufficient frequency to ensure that it is given to all relevant staff.

Cooperation with Enforcement Agencies

Communications to and from the enforcement agencies will be made through the anti-money laundering officer.

The reporting of suspicions of money laundering to the National Crime Agency (NCA) will be made on a full and timely basis once they have been considered as reportable by the anti-money laundering officer.

We will adhere to the seven-day consent rule contained within the Proceeds of Crime Act (2002) and the need to freeze accounts pending receipt of consent where necessary.

We will respond to requests for information from the relevant anti-money laundering enforcement agencies on a full, positive and timely basis.

With respect to requests received from such agencies within the UK we will provide relevant information on the production of a court order or a written request from an investigating officer of a recognised government or quasi-government institution, who has proper accreditation with NCA.

With respect to any other requests arising from enforcement agencies within the UK and to all requests arising from outside the UK, the response to the request will be made after reasonable enquiries have been made as to the bona fide nature and source of the request.

All communications to enforcement agencies will give due regard to customers' rights to confidentiality.

Risk Assessment Criteria

We will periodically undertake a 'know your business' review of our products and services, customers and methods of distribution so that we can perform a risk-based assessment of:

- the circumstances in which regular business acceptance and acquisition procedures apply;
- the exceptional circumstances in which business acceptance and acquisition is subject to extended procedures applied by the anti-money laundering officer; and
- the circumstances surrounding the likelihood of acquiring a politically exposed person as a customer together with reviewing the company's procedures for dealing with such customers.

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In addition, we will review and amend our risk-based assessment in light of any changes to our business model, for example, if we introduce new distribution channels to sell products or when new products are introduced.

Procedural Standards

Verification of identity & know your customer information

The verification of identity for customers will be undertaken in accordance with the Guidance provided by JMLSG and documented in our anti-money laundering procedures.

We will not enter into a new business relationship with a customer until all due diligence has been completed.

We will verify customers' identities by obtaining satisfactory evidence of identity which establishes that the customer is the person they claim to be. A customer's identity will usually be established by seeing their driving licence or passport and two additional documents such as a recent utility bill or bank statement showing the customer's current address. We will retain photocopies of the documents we have seen.

In some situations, we will carry out enhanced due diligence such as if we were to work with a Politically Exposed Person or any other situation where there is a higher risk of money laundering. The measures we would take in such circumstances include:

- approval from a director for establishing a business relationship;
- obtaining additional evidence of identity;
- establishing the source of wealth and source of the funds involved; and
- conducting enhanced ongoing monitoring of the business relationship

We recognise that some customers may not be able to produce the standard evidence of identity. In such cases we will take into account the JMLSG guidance set out in Sector 1: Retail banking, Annex 1-I as part of our verification process.

We maintain and periodically update an assessment of our products and means of distribution to establish our "know your customer" procedures, which is sufficient to establish the identity and the nature of the relationship with the customer, including source of funds or wealth as appropriate.

Employee awareness and training

We have established and maintained a formal money laundering awareness and training regime for all employees, tailored to the specific job functions carried out by each employee. Records of such training are maintained appropriately.

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Responsibility for the effective functioning of the money laundering awareness and training regime rests with the anti-money laundering officer, who ensures that there is also a system to ensure that awareness and training procedures are regularly updated to take account of:

- statutory and regulatory changes;
- changes to our anti-money laundering procedures; and
- changes in our strategy and in the operational environment in which we operate.

Internal reporting of suspicions

We have established and maintain procedures to ensure that all employees are aware of their legal obligations to report suspicions of money laundering.

The anti-money laundering officer will design, implement and maintain a system for the recognition and reporting of suspicions so that:

- each employee is clear as to whom they should report suspicions; and
- reports of suspicions reach the anti-money laundering officer on a timely basis.

The system for the recognition of suspicions will be founded upon adequate training and awareness procedures for staff engaged in relevant activities and upon an effective transaction monitoring system to identify exceptions.

Record Keeping

We keep copies of the evidence obtained of a customer's identity together with a written record of the risk assessment in relation to the customer for five years after the end of our relationship with the customer.