

## **Globe Apartments (Chiltern Street) Limited**

### **Anti-Money Laundering (AML) & Counter-Terrorist Financing (CTF) Policy**

**Version:** 4.0

**Policy Date:** February 2026

**Next Review Date:** February 2027

**Approved By:** Directors

**Document ID:** 38

**Nominated Officer (MLRO):** Ryan Brown

#### **1. Purpose**

This policy sets out Globe Apartments (Chiltern Street) Limited's approach to preventing money laundering and terrorist financing. It ensures compliance with UK law and supports Globe's wider governance, risk management and ISO-aligned compliance framework.

#### **2. Scope**

This policy applies to all employees, directors, contractors and relevant third parties involved in customer onboarding, property management, asset management, financial transactions and supplier relationships.

#### **3. Legal & Regulatory Framework (UK)**

This policy reflects current UK legislation and guidance, including:

- Proceeds of Crime Act 2002 (POCA)
- Terrorism Act 2000
- Money Laundering Regulations 2017 (as amended)
- Sanctions and Anti-Money Laundering Act 2018
- Economic Crime and Corporate Transparency Act 2023
- Criminal Finances Act 2017
- UK Sanctions regime and OFSI enforcement powers
- FATF risk-based approach to AML/CTF

#### **4. Risk-Based Approach**

Globe adopts a risk-based approach to AML/CTF. Higher-risk relationships receive enhanced scrutiny. Risk factors include customer type, geographic exposure, complex ownership structures, politically exposed persons (PEPs), third-party funding and non-standard transaction patterns.

Globe maintains a formal AML Risk Assessment which informs the application of CDD, EDD and monitoring controls.

## 5. Customer Due Diligence (CDD)

CDD is conducted before establishing business relationships. This includes verifying identity, beneficial ownership, understanding the purpose of the relationship, and ongoing monitoring.

CDD is not a one-off exercise and customer risk profiles are reviewed periodically and when trigger events occur (ownership changes, payment pattern changes, new jurisdictions, etc.).

Enhanced Due Diligence (EDD) applies to high-risk cases as described in section 6.

## 6. Property & Asset Management Specific Risks

Higher-risk scenarios include:

- Overseas landlords or investors
- Corporate SPVs with layered ownership
- Politically exposed landlords or beneficial owners
- Unusual third-party payments for rent or refurbishments
- Large or complex refurbishment funding arrangements
- Sudden changes in ownership or control

## 7. Sanction's Screening

All relevant customers, beneficial owners and counterparties must be screened against the UK sanctions list. Any potential match must be escalated immediately to the Nominated Officer. Globe operates a zero-tolerance approach to sanctions breaches.

Any confirmed sanctions matches will result in immediate suspension of transactions and reporting to OFSI in line with legal requirements.

## 8. Source of Funds & Source of Wealth

Staff must understand where funds originate and how customers have accumulated their wealth where relevant. Unusual, inconsistent or opaque funding sources must be challenged and documented.

For property sales transactions, Proof of Funds must be obtained for all purchasers before the memorandum of sale is issued. Acceptable evidence includes:

Mortgage agreement in principle plus bank statements showing deposit

Bank statements showing full cash amount available

Evidence of sale proceeds from a related property transaction

Gift letters with donor identification and verification

Investment account statements or inheritance documentation

Source of Funds verification must be documented on the client file and retained in accordance with record-keeping requirements

## 9. Reporting Suspicious Activity

All staff have a duty to report knowledge or suspicion of money laundering or terrorist financing to the Nominated Officer. The Nominated Officer will determine whether a SAR should be filed with the NCA. Tipping-off is a criminal offence.

SAR decisions and rationale are documented by the Nominated Officer and retained for audit purposes (even where no SAR is ultimately submitted).

## 10. Governance & Responsibilities

The Directors have overall responsibility for AML/CTF compliance. The Nominated Officer is responsible for operational AML oversight, SAR decisions, training coordination and ongoing monitoring.

The Nominated Officer has authority to halt onboarding or transactions where AML concerns are unresolved, and has direct access to Directors without obstruction.

## 11. Training & Awareness

All relevant staff must receive AML training at induction and at least annually thereafter. Training records are maintained.

## 12. Record Keeping

CDD and transaction records must be retained for a minimum of five years after the end of the business relationship and records are stored securely and in line with data protection requirements.

## 13. Monitoring & Review

This policy is reviewed annually or sooner if legislation, business activities or risk profile changes.

I have read and understand the above policy:-

Signed.....

Dated.....