

Flexiform

Anti-Money Laundering Policy

Flexiform is committed to being fully compliant with the provisions of the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002 and anti-terrorism laws.

Flexiform will do all it can to prevent the business being exposed to money laundering, to identify potential areas where it may occur, and to comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases.

This Policy applies to all employees of Flexiform Business Furniture and aims to maintain the high standards of conduct, which currently exist within the business by preventing criminal activity through money laundering.

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

We conduct due diligence enquiries on all new clients to establish and verify our clients' 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 our clients. We cannot act if sufficient information is not provided.

Where we need to carry out customer due diligence we seek evidence of identity, for example:

- Checking the customer's website to confirm their business address
- Conducting an on-line search via Companies House to confirm the nature and business of the customer and confirm identities of any directors
- Seeking evidence from the key contacts or Individuals of their personal identity, for example their passport, and position within the organisation.
- We generally require original documentation for verification.
- We use third party providers who search external electronic databases as part of this diligence process.
- We also undertake risk assessments for all new matters for existing clients.

Ongoing customer due diligence must also be carried out during the life of a business relationship but should be proportionate to the risk of money laundering and terrorist funding, based on the other's knowledge of the Customer and a regular scrutiny of the transactions involved.

If, at any time, we suspect that a client or customer is carrying out money laundering or terrorist financing, or has lied about their identity then it must be reported to Managing Director, Nick Hewitt, and the National Crime Agency (<https://nationalcrimeagency.gov.uk/contact-us>).

On-going Monitoring

We undertake on-going monitoring of all existing clients (which may require you to provide us with updated proof of identity documentation).

Tipping off

We must report to the National Crime Agency and other relevant authorities any suspicion or knowledge regarding money laundering or the proceeds of crime. We are not permitted to notify clients of the fact that such reports have been made.

Money Laundering Reporting Officer (MLRO)

When complying with the obligations we are required to:

- Appoint a Money Laundering Reporting Officer (MLRO) to receive disclosures from employees of money laundering activity.
- Implement risk sensitive policies and procedures relating to customer due diligence, reporting, record keeping, internal control, risk assessment and management, monitoring and management of compliance, along with the communication of policies and processes.

Nominated Officer

The officer nominated to receive such reports from staff within Flexiform is the Managing Director, Nick Hewitt. He can be contacted as follows:

Address: 1392 Leeds Road, Bradford, West Yorkshire, BD3 7AE

Tel: 01274 706206

Email: nickh@flexiform.co.uk

Confidentiality

Our duties to report to the National Crime Agency may take priority over any duty to keep client information and the detail of your transactions confidential.

This policy will be reviewed and updated annually.



Nick Hewitt
Managing Director
Flexiform Business Furniture Ltd
January 2020