



Anti-Money Laundering Policy

Introduction

Henderson Biomedical is a UK registered company providing the service, repair and calibration of laboratory equipment. The business of the Company is low risk in relation to money laundering, however in order to prevent any of our services being used (or potentially used) for any money laundering activity, as well as any of our staff being exposed to money laundering, we wish to put in place the following anti-money laundering policy.

Scope of the Policy

The broad definition of money laundering means that potentially anyone could commit a money laundering offence, this includes all employees of the Company, all temporary staff and contractors.

Our policy is to enable the Company to meet its legal and regulatory requirements in a way which is proportionate to the low risk nature of the business, by taking reasonable steps to minimise the likelihood of money laundering occurring.

All employees must be familiar with their legal responsibilities and failure to comply with this Policy may lead to disciplinary action.

What is Money Laundering?

The Proceeds of Crime Act 2002 (POCA) consolidated, updated and reformed criminal law with regard to money laundering.

Money laundering can be defined as the process to move illegally acquired cash through financial systems so that it appears to be from a legitimate source. Money laundering offences include: concealing, disguising, converting, transferring criminal property or removing it from the UK (Section 327 POCA); entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (Section 328 POCA); and acquiring, using or possessing criminal property (Section 329 POCA).

There are also several secondary offences, failure to disclose knowledge or suspicion of money laundering to the Money Laundering Reporting Officer (MLRO); failure by the MLRO to disclose knowledge or suspicion of money laundering to the National Crime Agency; and 'tipping off' whereby somebody informs a person or persons who are, or who are suspected



of being involved in money laundering, in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.

Any member of staff could potentially be caught by the money laundering provisions, if they suspect money laundering and either become involved with it in some way, and/or do nothing about it. This Policy sets out how any concerns should be raised.

Money Laundering Reporting Officer (MLRO)

The Company will appoint a MLRO to receive disclosures about money laundering activity and be responsible for anti-money laundering activity within the Company. The officer nominated to do this is the Managing Director.

The MLRO will ensure that appropriate training and awareness is provided to new and existing employees, temporary staff and contractors and that this is reviewed and updated as required.

The MLRO will ensure that appropriate anti-money laundering systems and processes are incorporated by the Company.

Suspicious of Money Laundering

All employees, temporary staff and contractors must immediately report any suspicious activity to the MLRO in the prescribed form as set out in this policy document.

Once the matter has been reported to the MLRO, the employee, temporary staff or contractor must follow the directions given to him/her and must NOT make any further enquiry into the matter.

The employee, temporary staff member or contractor must NOT voice any suspicions to the person(s) whom they suspect of money laundering, as this may result in the commission of the offence of "tipping off". They must NOT discuss the matter with others or note on the file that a report has been made to the MLRO in case this results in the suspect becoming aware of the situation.

Consideration of the Disclosure by the MLRO

Once the MLRO has received the report, it must be evaluated in a prompt manner in order to determine whether:

- There is actual or suspected money laundering taking place; or
- There are reasonable grounds to know or suspect that this is the case; and



- Whether the MLRO needs to lodge a Suspicious Activity Report (SAR) with the National Crime Agency (the NCA).

Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then consent will be given for any on-going or imminent transaction(s) to proceed.

Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has given specific consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.

All disclosure reports referred to the MLRO and reports made to the NCA will be retained by the MLRO in a confidential file kept for that purpose, for a minimum of 5 years.

The MLRO must also consider whether additional notifications and reports to other relevant enforcement agencies should be made.

Customer Identification and Due Diligence

Due diligence is performed on all customers who must provide basic information including name, address and registration details.

With instructions from new customers or customers not known well to the Company, customers in known high risk industries and/or jurisdictions, transactions that are unusual for the customer or other unusual requests, highly complex transactions or payment arrangements, the Company may wish to seek additional evidence of identity. This may include:

- Checking the organisations website to confirm the identity of personnel, its business address and any other details;
- Checking company details on Companies House;
- Checking the business address on Google Streetview;
- Verifying the email of the customer;
- Attending the customer at their business address;
- Searching the telephone directory;
- Evidence of the personal identity of the key contact (passport, photo, driving licence etc).

If satisfactory evidence of identity is not obtained at the outset then the business relationship or one off transaction(s) cannot proceed any further.



Change of Banking Details

If a customer claims that their banking details have changed, we will contact our existing accounts contact by phone and check that this is the case. We may require a signed letter of approval confirming the changes before any payments are made.

Record Keeping

Where “relevant business” is carried out then the customer identification evidence and details of the relevant transaction(s) for that customer must be retained for at least 5 years.

Document Control

Date	Revision/Amendment Details and Reason	Author
2/1/2018	Introduction of new Anti Money Laundering Policy	AH

A handwritten signature in black ink, appearing to be 'AH', is written over a faint, larger version of the signature.

Alex Henderson
Managing Director

Dated 3/1/2018

Next review: 2/1/2019 or earlier if required.

This Anti Money Laundering Policy is to be read annually by all staff