

# HARVEY ROBINSON

## Public Anti-Money Laundering Statement

Website version | Effective from 30 June 2026

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| <b>Purpose</b>          | To explain our customer due diligence obligations and why we ask clients and connected parties for identity and funding information.                             |
| <b>Applies to</b>       | Vendors, purchasers, landlords, tenants where applicable, beneficial owners, donors and other financial contributors.  |
| <b>Regulatory basis</b> | Money Laundering Regulations 2017 as amended; HMRC supervision for estate agency businesses; UK sanctions obligations; FATF high-risk jurisdiction requirements. |

### Our commitment

Harvey Robinson Estate Agents is committed to preventing money laundering, terrorist financing, proliferation financing, sanctions evasion and other financial crime. We are supervised by HMRC for anti-money laundering purposes and we maintain policies, procedures, systems and controls designed to identify and manage financial crime risk.

### Why we complete checks

Before we can act in a property transaction, we are required to understand who our clients and relevant connected parties are, who owns or controls any company or legal entity involved, where purchase funds are coming from, and whether any higher-risk indicators are present.

- We complete identity verification and, where appropriate, biometric checks through our AML provider, currently Landmark.
- We screen relevant parties for sanctions, politically exposed person status and other AML risk indicators.
- We ask purchasers and relevant contributors to evidence their source of funds.
- Where the risk assessment requires it, we may ask additional questions about source of wealth.
- We may need to verify beneficial owners, company officers, donors, third-party funders or other parties connected to the transaction.

### Who we may need to check

Depending on the transaction, checks may be required for vendors, purchasers, landlords, tenants, company directors, beneficial owners, trustees, attorneys, executors, gifted deposit donors and anyone else financially contributing to the purchase.

## **Source of funds and source of wealth**

Source of funds means the specific money being used for the transaction, such as savings, mortgage funds, sale proceeds, inheritance, investment withdrawals or gifted deposits. Source of wealth means how the person built up their overall wealth. We will ask for information and documents that are reasonable and proportionate to the risk of the transaction. We may also ask for further information where funds have been received from another person or organisation.

## **Higher-risk matters**

Some transactions require enhanced due diligence, additional evidence or senior review. Examples include complex ownership structures, overseas funds, higher-risk jurisdictions, politically exposed persons, sanctions concerns, unusual urgency, unexplained third-party payments or transactions that do not appear consistent with the person's circumstances.

From 30 June 2026, we apply enhanced due diligence where required by the Money Laundering Regulations, including where a business relationship or transaction involves a FATF Call for Action jurisdiction. FATF grey-list countries are also considered as geographic risk factors as part of our overall risk assessment.

## **Sanctions and suspicious activity**

We must not proceed where doing so would breach sanctions law. Where we identify a possible sanctions issue, suspicious activity, unexplained funds or a concern that cannot be resolved, we may pause the transaction, ask further questions, decline to act, or make a report to the appropriate authority. We may not be able to explain all decisions where legal restrictions apply.

## **Your cooperation**

We appreciate that AML checks can feel intrusive. These checks are a legal requirement and are designed to protect our clients, our business, the property market and the wider public from financial crime. A delay in providing requested information may delay the transaction, and failure to provide satisfactory information may mean we cannot continue to act.

## **Data protection and records**

Personal data collected for AML purposes is processed in accordance with UK data protection legislation and retained for the period required under anti-money laundering legislation. We only request information that is relevant to our legal obligations and our risk assessment.

## **Policy review**

This statement is reviewed periodically and after relevant changes to AML law, HMRC guidance, FATF public lists or sanctions requirements.

**Reference sources**

- HMRC: Money laundering supervision and estate agency business guidance.
- HMRC: Understanding risks and taking action for estate agency businesses, updated September 2025.
- HM Treasury: Money Laundering Advisory Notice, June 2026.
- The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017, as amended.