



ASSETVIA AND PARTNERS LTD
DEAL SOURCING · UNITED KINGDOM

Anti-Money Laundering Risk Assessment Policy & Procedure

*Prepared for HMRC anti-money-laundering supervision under the Money Laundering,
Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
(as amended)*

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CONTROLLED DOCUMENT

Contents

Section	Title
1	Purpose, scope and legal basis
2	Governance, roles and responsibilities
3	Methodology: how risk is scored
4	The firm-wide (business-wide) risk assessment
5	Customer / client risk
6	Product, service and transaction risk
7	Geographic risk
8	Delivery channel risk
9	Firm-wide risk register and residual ratings
10	Procedure: customer due diligence (CDD, SDD, EDD)
11	Procedure: ongoing monitoring and source of funds/wealth
12	Procedure: PEPs, sanctions and adverse media screening
13	Procedure: suspicion, internal reporting and SARs
14	Record keeping and data protection
15	Training and awareness
16	Independent review, testing and audit
17	Review cycle, version control and approval
Appendix A	Risk assessment scoring matrix
Appendix B	Client risk assessment form (template)
Appendix C	Red-flag indicators for property sourcing
Appendix D	Internal suspicion report form (template)

1. Purpose, scope and legal basis

Assetvia and Partners Ltd ("Assetvia", "the firm") is a UK property deal sourcing and introduction business. The firm identifies, analyses and packages off-market and on-market residential and mixed-use investment opportunities and introduces them to investor clients, charging a disclosed sourcing fee of 3% of the purchase price. Because the firm carries out work of an estate agency business within the meaning of section 1 of the Estate Agents Act 1979 — including introducing buyers to sellers with a view to the disposal of an interest in land — it is a relevant person for the purposes of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ("MLR 2017") and is supervised for AML purposes by HM Revenue & Customs.

Statutory basis

This document is the firm's written risk assessment required by regulation 18 MLR 2017 and the written policies, controls and procedures required by regulation 19. It is designed to be produced to HMRC on request as evidence of compliance and is read with the legislation and guidance listed below.

- **MLR 2017** (as amended by the Money Laundering and Terrorist Financing (Amendment) Regulations 2019 and 2022) — regulations 18–21 (risk assessment, policies, controls, procedures), 27–38 (customer due diligence), 39–40 (records), 24 (training).
- **Proceeds of Crime Act 2002** (POCA), Part 7 — sections 327–329 (principal money laundering offences), 330–332 (failure to disclose), 333A (tipping off), 335–336 (appropriate consent / defence against money laundering).
- **Terrorism Act 2000**, Part III — sections 15–18 and 21A (failure to disclose in the regulated sector).
- **Sanctions and Anti-Money Laundering Act 2018** and the UK sanctions regimes administered by OFSI — strict liability financial sanctions obligations.
- **Criminal Finances Act 2017** — unexplained wealth orders and the corporate failure-to-prevent offences.
- **Estate Agents Act 1979** and the Consumer Protection from Unfair Trading Regulations 2008 — material information and disclosure duties.
- **Economic Crime (Transparency and Enforcement) Act 2022** — the Register of Overseas Entities where the counterparty is an overseas entity holding UK land.
- **HMRC guidance for estate agency and letting agency businesses**, the **National Risk Assessment of Money Laundering and Terrorist Financing**, and **NCA SARs guidance**.

Scope

This policy applies to every director, employee, consultant, self-employed sourcing agent, introducer and contractor acting for Assetvia, in respect of every instruction — vendor-side sourcing mandates, investor-side acquisition mandates, joint ventures, assignable contracts, lease options and any transaction where the firm is remunerated for introducing a buyer and a seller. Compliance is a condition of engagement; breach is a disciplinary matter and may be a criminal offence.

Objectives

- Identify and assess the money laundering and terrorist financing (ML/TF) risk to which the business is subject.
- Apply proportionate, risk-sensitive controls that mitigate that risk to an acceptable residual level.
- Ensure both the buyer and the seller in every transaction are identified and verified before the firm is treated as having entered into a business relationship.
- Ensure suspicion is recognised, escalated internally and, where appropriate, reported to the National Crime Agency without tipping off.
- Maintain a documented, auditable and current evidence trail for HMRC.

2. Governance, roles and responsibilities

The board of Assetvia and Partners Ltd owns AML risk. Day-to-day responsibility is allocated as set out below. Regulation 21 MLR 2017 requires the appointment of a nominated officer and, where appropriate to the size and nature of the business, a board-level officer responsible for compliance. Given the firm's size, both functions are held by the Director of Operations, with the founding partner acting as deputy to preserve segregation where the nominated officer is conflicted.

Role	Holder	Core responsibilities
Board / Directors	All directors	Approve this policy and the firm-wide risk assessment annually; ensure adequate resourcing; receive quarterly AML management information; oversee remedial action.
Nominated Officer (MLRO) and regulation 21 officer	Francis Maronda, Director of Operations	Receive and evaluate internal suspicion reports; decide on and submit SARs to the NCA; hold the NCA SAR Online account; approve high-risk onboarding and EDD; own the training programme; act as the HMRC point of contact.
Deputy Nominated Officer	Founding Partner	Act in the MLRO's absence or where the MLRO is conflicted; maintain independence of challenge.
Sourcing / deal staff and self-employed agents	All fee earners	Collect and verify CDD before an introduction proceeds; complete a client risk assessment for every seller and buyer; escalate red flags immediately; never discuss a report with the client.
Operations / administration	Operations team	Maintain the client and transaction records, screening evidence and retention schedule; diarise periodic reviews and re-verification.
Independent reviewer	External compliance consultant	Perform the annual independent audit of the AML framework under regulation 21(c) and report findings to the board.

Fit and proper / approval

Every beneficial owner, officer and manager (BOOM) is approved by HMRC under regulation 26 before appointment. No person may act in a relevant role until approval is confirmed and a basic DBS check and self-declaration of unspent relevant convictions is held on file. Regulation 26 approval status is re-confirmed annually as part of the review of this document.

3. Methodology: how risk is scored

The firm applies a structured, repeatable methodology consistent with regulation 18(2) MLR 2017. Inherent risk is assessed across the five statutory risk factors — customer, product/service, transaction, geography and delivery channel — before controls are considered. The mitigating effect of the firm's controls is then applied to produce a residual risk rating that drives the level of due diligence.

Step 1 — Identify. Risk events are identified from the National Risk Assessment, HMRC sector guidance, NCA typologies, trade-body alerts and the firm's own transaction experience and internal reports.

Step 2 — Score inherent risk. Each risk is scored for **likelihood** (1 rare to 5 almost certain) and **impact** (1 negligible to 5 severe: criminal liability, HMRC sanction, loss of supervision, reputational destruction). Inherent score = likelihood × impact.

Step 3 — Assess controls. Control effectiveness is rated Strong (×0.4), Adequate (×0.6) or Weak (×0.9) based on documented evidence of design and operation, including file testing results.

Step 4 — Residual rating. Residual score = inherent score × control factor, banded as set out in Appendix A. Any residual score in the High or Very High band requires a documented board-approved action plan with an owner and a target date.

Step 5 — Apply. The client-level rating derived from the same matrix determines whether simplified, standard or enhanced due diligence applies, and sets the monitoring frequency.

Band	Score	Rating	Required response
1	1 – 5	Low	Standard CDD. Periodic review every 24 months or on trigger event.
2	6 – 11	Medium	Standard CDD plus documented source of funds narrative. Review every 12 months.
3	12 – 18	High	Enhanced due diligence, MLRO sign-off before the introduction proceeds. Review every 6 months.
4	19 – 25	Very High	Presumption of refusal. Proceed only with written board and MLRO approval, full EDD and continuous monitoring; consider SAR.

4. The firm-wide (business-wide) risk assessment

The property sector is assessed in the UK National Risk Assessment as carrying a high inherent ML risk. Real estate offers criminals a high-value, stable store of value, the ability to integrate large sums in a single transaction, and — through companies, trusts and overseas structures — opacity of ownership. As an intermediary that meets both sides of a transaction early, often before solicitors are instructed, Assetvia occupies a gatekeeper position and is exposed to that risk directly.

The firm's specific exposure is shaped by four features of its model: (a) it deals in off-market stock where vendors may be distressed or motivated by speed and discretion; (b) it introduces cash-rich investor buyers who complete quickly; (c) a proportion of buyers are corporate vehicles, SPVs or overseas investors; and (d) engagement is predominantly non-face-to-face. Sections 5 to 8 assess each statutory risk factor; section 9 consolidates the results.

Overall firm-wide inherent risk is assessed as HIGH. With the controls in this document operating effectively, overall residual risk is assessed as MEDIUM.

5. Customer / client risk

Both parties are the firm's customers. Under regulation 30A and HMRC guidance for estate agency businesses, an estate agency business must apply CDD to **both** the seller (from the point of instruction) and the buyer (no later than the point at which an offer is accepted). Assetvia's standard is earlier: no buyer receives address-specific deal pack information until identity verification is complete.

Client characteristic	Risk	Rationale and required treatment
UK individual, owner-occupier vendor, verified electronically, mortgage-funded buyer	Low	Transparent ownership, regulated lender performing parallel checks. Standard CDD.
UK limited company / SPV buyer with clear UK beneficial ownership	Medium	Verify incorporation, registered office, directors and all beneficial owners holding >25%; obtain PSC register extract and confirm against Companies House; note any discrepancy reporting obligation.
Cash buyer with no lender involvement	High	No third-party check on funds. Full source of funds and source of wealth evidence required, corroborated by documents (bank statements, sale proceeds, accountant letter).
Distressed or repossession-adjacent vendor, or vendor selling materially below market value	High	Risk of duress, fraud or disguised value transfer. Establish legal title, capacity, motive and independent legal advice; document rationale.
Overseas buyer, overseas entity or offshore structure	High	Register of Overseas Entities check; EDD on structure, controllers and jurisdiction; enhanced source of wealth.
Politically exposed person, family member or known close associate	High	Mandatory EDD under regulation 35, senior management (MLRO) approval, source of wealth evidence and enhanced ongoing monitoring.

Client characteristic	Risk	Rationale and required treatment
Client refusing to provide information, using nominees, or insisting on unusual urgency or secrecy	Very High	Decline or exit; consider internal suspicion report and SAR. Do not tip off.
Trust, foundation or complex layered structure	High	Identify settlor, trustees, protector, beneficiaries and any person with control; obtain trust deed and Trust Registration Service evidence.

6. Product, service and transaction risk

The firm's products are sourcing mandates, deal packages and introductions. The service does not involve holding client money: Assetvia does not operate a client account, does not receive purchase monies, and all deposits and completion funds pass exclusively between regulated solicitors. This materially reduces integration risk but does not remove placement and layering risk at the introduction stage.

Service / transaction feature	Risk	Treatment
Standard introduction, buyer funded by a UK regulated lender, solicitors on both sides	Low	Standard CDD; rely on the transaction chain for corroboration but never delegate responsibility.
Below-market-value (BMV) acquisition	High	Document the commercial reason for the discount; obtain comparable evidence; confirm the vendor has independent legal advice; escalate where the discount exceeds 20% without an evident reason.
Assignable contracts, contract flips and sale of an equitable interest	High	Verify the ultimate purchaser, chain of assignment and fee flows; require full CDD on the assignee.
Joint ventures and multiple undisclosed investors behind one buyer	High	Identify every participant contributing funds and every beneficial owner of the acquiring vehicle.
Sourcing fee paid by a third party who is not the client	High	Establish the payer's identity, relationship and source of funds; decline anonymous or unexplained third-party payments.
Fee received in cash or cryptoassets	Very High	Prohibited. The firm accepts fees only by bank transfer from an account in the client's own name at a regulated institution in the UK or an equivalent jurisdiction.
Rapid resale or repeated back-to-back transactions on the same asset	High	Investigate the economic rationale; treat unexplained rapid churn as a red flag warranting an internal report.
Transaction abandoned after CDD raises questions	Very High	Consider a SAR; the withdrawal itself may be the disclosable suspicion. Retain all records.

7. Geographic risk

Geographic risk is assessed both by the location of the asset and by the residence, nationality and funding jurisdiction of the client.

- **Asset location.** The firm operates in UK regional residential markets. Domestic geographic risk is low to medium; however, areas with high investor churn and a high proportion of cash purchases attract slightly elevated scrutiny.
- **Client jurisdiction.** Clients connected with jurisdictions listed as high-risk third countries in Schedule 3ZA MLR 2017, or subject to FATF calls for action or increased monitoring, trigger mandatory EDD under regulation 33(1)(b).

- **Sanctions.** Any match against the UK Sanctions List, the OFSI consolidated list or an applicable UN, EU or OFAC list results in immediate cessation of dealings, freezing of any relationship and a report to OFSI. Sanctions obligations are strict liability and are not risk-based.
- **Funding jurisdiction.** Funds routed through jurisdictions with weak AML supervision, secrecy laws or no obvious connection to the client require documented explanation and corroborating evidence before the introduction proceeds.

8. Delivery channel risk

Assetvia's model is digital-first: leads arrive through the website, paid campaigns, social media, referrals and introducer networks; deal packs are delivered through secure links; and much of the relationship is conducted remotely. Non-face-to-face onboarding is an elevated risk factor under regulation 33(1)(f) where no adequate safeguard is applied.

Channel	Risk	Control applied
Website enquiry / deal-pack request	Medium	Identity gating before address-specific data is released; electronic ID&V with liveness check; audit log of pack access.
Introducer or agent referral	High	Introducer due diligence, written terms, confirmation that the firm — not the introducer — performs CDD; annual introducer review.
Face-to-face viewing or meeting	Low	Sight of original documents, certified copy retained.
Remote onboarding of a corporate buyer	High	Electronic verification of the entity plus verification of each beneficial owner; Companies House discrepancy reporting where records conflict.
Social media / paid advertising leads	Medium	Standard CDD; heightened alertness to fabricated identities and mule accounts.

Where a client is not physically present, the firm applies at least two independent safeguards: an electronic identity check from an established provider meeting the JMLSG/HMRC standard, and either a certified document check or a verified payment from a UK bank account in the client's own name.

9. Firm-wide risk register and residual ratings

#	Risk event	Inherent score	Key controls	Residual score
R1	Criminal property laundered through a UK purchase introduced by the firm	20 (Very High)	CDD on both parties; SoF/SoW evidence; solicitor chain; red-flag escalation	8 (Medium)
R2	Buyer's identity or beneficial ownership concealed behind an SPV or nominee	16 (High)	Beneficial ownership verification >25%; PSC and ROE checks; discrepancy reporting	7 (Medium)
R3	Failure to identify a PEP or sanctioned person	15 (High)	Screening at onboarding and re-screening at agreement of terms and pre-completion	6 (Medium)
R4	Staff or self-employed agent fails to recognise or escalate suspicion	12 (High)	Annual training with testing; red-flag card; MLRO open-door; file review	5 (Low)
R5	Tipping off during or after an internal report	12 (High)	Restricted information; scripted holding responses; MLRO controls all communication	4 (Low)
R6	Vendor under duress or victim of property fraud (title hijack)	12 (High)	Title verification at Land Registry; proof of ownership and occupation; independent legal advice	5 (Low)

#	Risk event	Inherent score	Key controls	Residual score
R7	Fee paid by an unexplained third party	10 (Medium)	Bank-transfer-only policy from an account in the client's name; payer verification	4 (Low)
R8	Records incomplete or destroyed early, preventing HMRC inspection	9 (Medium)	Retention schedule; central register; access controls; annual file testing	3 (Low)
R9	Cyber compromise or conveyancing payment-diversion fraud affecting clients	12 (High)	MFA; encrypted storage; no payment instructions issued by the firm; client warning notice	5 (Low)
R10	Business grows faster than the compliance resource	9 (Medium)	Quarterly MI to board; trigger to appoint additional compliance resource at defined volumes	4 (Low)

10. Procedure: customer due diligence

When CDD must be applied

- On the seller, at the point the firm is instructed or enters into a business relationship — before the property is marketed or packaged.
- On the buyer, at the earliest of: registration for deal packs, submission of an offer, or acceptance of an offer. Assetvia applies it at registration.
- On any occasional transaction of €15,000 or more, whether in a single operation or in linked operations.
- Whenever there is suspicion of ML/TF, regardless of value or exemption.
- Whenever there is doubt about the veracity or adequacy of documents or information previously obtained.
- At appropriate intervals during the relationship, on a risk-sensitive basis, as part of ongoing monitoring.

Standard CDD — individuals

Full name, date of birth, current residential address and, where relevant, nationality; verified from independent, reliable sources. The firm's standard is one government-issued photographic identity document plus one independent address confirmation dated within three months, or a single electronic verification returning at least two matches from independent data sources with a liveness check. Copies are retained with the date, method and name of the verifier recorded.

Standard CDD — legal persons

- Company name, registered number, registered office and principal place of business.
- Constitutional documents and evidence of incorporation from Companies House or an equivalent register.
- Names of the board and senior management, and identity verification of the individual instructing the firm together with evidence of their authority.
- Identification and verification of every beneficial owner holding or controlling more than 25% of shares or voting rights, or otherwise exercising control; where no such person exists, the senior managing official is identified and the reason recorded.
- Where the register at Companies House conflicts with the information obtained, a discrepancy report is filed as required by regulation 30A.
- For an overseas entity acquiring UK land, evidence of registration on the Register of Overseas Entities and its assigned OE identifier.

Simplified due diligence (SDD)

SDD may be applied only where the firm has determined, and documented, that the business relationship presents a low degree of risk — for example a UK-listed company, a UK public authority, or a UK-regulated financial institution acting as principal. SDD reduces the extent and timing of verification; it never removes the obligation to identify the client or to monitor the relationship. SDD is approved by the MLRO and reviewed at each periodic review.

Enhanced due diligence (EDD)

EDD is mandatory under regulation 33 where: the client or transaction involves a high-risk third country; the client is a PEP, family member or known close associate; the client has provided

false or stolen documentation; the transaction is complex, unusually large, or has no apparent economic or legal purpose; the relationship is conducted at a distance without adequate safeguards; or the firm's own assessment rates the client High or Very High.

EDD comprises, as a minimum: additional independent identity evidence; documented source of funds **and** source of wealth with corroborating documents; enhanced screening including adverse media; written rationale for the transaction; MLRO approval recorded before the introduction proceeds; and increased monitoring frequency (at least six-monthly).

Failure to complete CDD

If CDD cannot be completed, the firm must not establish the business relationship or carry out the transaction, must terminate any existing relationship, and must consider whether an internal suspicion report is required. Staff must not explain to the client that a report may be made.

11. Procedure: ongoing monitoring, source of funds and source of wealth

Ongoing monitoring under regulation 28(11) means scrutinising the transactions undertaken throughout the relationship to ensure they are consistent with the firm's knowledge of the client, their business and risk profile, and keeping CDD documents and information up to date.

Client rating	Periodic review	Trigger events requiring immediate re-assessment
Low	Every 24 months	Change of ownership or controller; new funding source; adverse media; a transaction inconsistent with profile.
Medium	Every 12 months	As above, plus a material change in transaction size or frequency.
High / Very High	Every 6 months, with continuous transaction-level scrutiny	Any change at all in structure, funding, jurisdiction or behaviour; any sanctions or PEP status change.

Source of funds vs source of wealth

Source of funds is the origin of the specific money being used in this transaction — for example the sale proceeds of a named property, a mortgage offer from a named lender, or a documented director's loan. **Source of wealth** is how the client accumulated their overall wealth — for example business ownership, salaried employment over a period, inheritance or investment returns. For any High-rated client the firm obtains and records both, supported by documents such as bank statements covering at least three months, completion statements, mortgage offers, audited accounts, tax returns, grant of probate or an accountant's letter. A client's unsupported assertion is never sufficient.

12. Procedure: PEPs, sanctions and adverse media screening

- Every individual client, beneficial owner and controller is screened against PEP, sanctions and adverse media data at onboarding, on agreement of terms, and again before exchange or completion where the timeline exceeds three months.
- Screening evidence — provider, date, search terms, result and reviewer — is saved to the client file. A negative result is evidence and is retained.
- A domestic or foreign PEP, family member or known close associate may only be onboarded with the MLRO's written approval, full source of wealth evidence and enhanced monitoring. PEP status is not a reason to refuse service automatically, and the firm applies proportionate treatment for domestic PEPs in line with regulation 35(3A).
- A true or probable sanctions match halts all activity immediately: no funds, information or services are provided; the MLRO reports to OFSI without delay; and the client is not informed of the reason.
- Adverse media relating to fraud, corruption, drug trafficking, tax evasion, human trafficking or organised crime is escalated to the MLRO for a documented decision to proceed, apply EDD, or exit and report.

13. Procedure: suspicion, internal reporting and SARs

Any person acting for Assetvia who knows, suspects, or has reasonable grounds to know or suspect that a person is engaged in money laundering or terrorist financing must submit an internal suspicion report to the Nominated Officer **as soon as practicable** and in any event on the same working day. Suspicion is more than mere speculation but far less than proof; it does not require the reporter to know what the underlying criminality is.

The reporting chain

- **Step 1 — Report internally.** Complete the internal suspicion report (Appendix D) and send it to the Nominated Officer. Do not discuss it with the client, colleagues who do not need to know, or any third party.
- **Step 2 — Continue normal service.** Take no action that could alert the client. Do not delay or accelerate the transaction in a way that signals a report. Do not decline the instruction with an explanation that reveals suspicion.
- **Step 3 — MLRO evaluation.** The Nominated Officer reviews the report against all available information within two working days, records the analysis and reaches a reasoned decision to report or not to report. The reasoning is documented either way and retained.
- **Step 4 — Submit a SAR.** Where the suspicion stands, the Nominated Officer submits a SAR to the National Crime Agency through SAR Online, using the correct glossary codes and requesting a defence against money laundering (DAML) under section 335 POCA where the firm would otherwise commit a prohibited act.
- **Step 5 — Consent and deadlines.** Where DAML is sought, the firm does not proceed during the seven-working-day notice period unless consent is given, and observes the 31-calendar-day moratorium if refused. The MLRO manages client communication during this period without tipping off.
- **Step 6 — Record.** The SAR reference, submission date, NCA response and any consent decision are recorded in the confidential SAR register held by the MLRO with restricted access.

Tipping off and prejudicing an investigation

Disclosing to the client or a third party that a report has been made, or that an investigation is contemplated or under way, is an offence under sections 333A and 342 POCA carrying up to five years' imprisonment. Staff use only the approved holding language: "We are completing our standard compliance checks and will revert as soon as we are able." No further explanation is given, and all questions from the client are routed to the MLRO.

Protection for the reporter

A person who makes an internal report in good faith is protected from any claim for breach of confidence and from any detriment by the firm. Assetvia operates a non-retaliation policy; a reporter may also escalate directly to the NCA if the internal route is unavailable or compromised.

14. Record keeping and data protection

Record	Retention period	Held by
CDD/EDD evidence, ID documents, screening results, client risk assessments	5 years from the end of the business relationship or completion of the occasional transaction	Operations, encrypted client folder
Transaction records, deal packs, fee agreements, correspondence	5 years from completion of the transaction	Operations
Internal suspicion reports, MLRO decisions, SARs and NCA responses	5 years from the date of the report, held separately with restricted access	MLRO only
Training records, attendance and test results	5 years	MLRO
Firm-wide risk assessment, policy versions, board minutes, audit reports	Indefinitely (minimum 5 years per version)	Board

Records are stored electronically in access-controlled cloud storage with multi-factor authentication, encryption in transit and at rest, and role-based permissions. Data is deleted at the end of the retention period unless a longer period is required by law, court order or an ongoing investigation.

Regulation 41 MLR 2017 requires the deletion of personal data obtained solely for AML purposes at the end of the retention period. The firm's lawful basis for processing under UK GDPR is compliance with a legal obligation (Article 6(1)(c)); special category and criminal offence data are processed under Schedule 1, Part 2 of the Data Protection Act 2018 (preventing or detecting unlawful acts). Clients are told at onboarding, through the firm's privacy notice, that their data is processed for AML purposes; the right to erasure does not override the statutory retention obligation.

15. Training and awareness

- All relevant staff, consultants and self-employed sourcing agents complete AML training before handling any client and at least annually thereafter.
- Training covers: the law and offences; the firm's risk assessment and this procedure; CDD, EDD and beneficial ownership; sector-specific red flags (Appendix C); the internal reporting route; tipping off; sanctions; and data protection.
- Competence is tested by a short assessment; a pass mark of 80% is required, with re-training where not achieved.
- Ad-hoc alerts are issued whenever HMRC, the NCA or the National Risk Assessment identifies a new typology relevant to property sourcing.
- Attendance, content, date and test results are recorded and retained for five years and are available for HMRC inspection.

16. Independent review, testing and audit

Regulation 21(1)(c) MLR 2017 requires an independent audit function where appropriate to the size and nature of the business, to examine and evaluate the adequacy and effectiveness of the firm's policies, controls and procedures, make recommendations, and monitor compliance with those recommendations.

- **Annual independent review** by an external compliance consultant who has no involvement in day-to-day sourcing, reporting in writing to the board.
- **Quarterly internal file testing** of a sample of at least five completed and five aborted files, checking CDD completeness, timeliness, screening evidence, risk rating rationale and MLRO approvals where required.
- **Quarterly management information** to the board: number of clients onboarded by risk band, EDD cases, internal reports, SARs submitted, declined or exited relationships, training completion, and open audit actions.
- **Remediation.** Every finding is assigned an owner, a risk rating and a target date, and is tracked to closure at the next board meeting.

17. Review cycle, version control and approval

This risk assessment and the associated policies, controls and procedures are reviewed at least annually by the Nominated Officer and approved by the board. An out-of-cycle review is triggered by: a change in the MLR or related legislation; publication of a new National Risk Assessment or HMRC guidance; a change in the firm's services, client base, geography or delivery channels; a material internal control failure; or an HMRC intervention. Each version is recorded below and superseded versions are archived, not destroyed.

Version	Date	Author	Summary of change	Approved by
1.0	20 August 2026	F. Maronda, Nominated Officer	First issue: full firm-wide risk assessment and AML procedures for HMRC supervision.	Board of Directors

Approval and declaration

I confirm that this document constitutes the written risk assessment required by regulation 18 and the written policies, controls and procedures required by regulation 19 of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, that it has been approved by the senior management of Assetvia and Partners Ltd, and that it is maintained and kept up to date.

Signature

Signature

Francis Maronda
Director of Operations · Nominated Officer (MLRO)
Date: _____

For and on behalf of the Board
Assetvia and Partners Ltd
Date: _____

APPENDIX A

Risk assessment scoring matrix

Inherent risk score = likelihood × impact. Read the score at the intersection and apply the band from section 3.

Impact → Likelihood ↓	1 Negligible	2 Minor	3 Moderate	4 Major	5 Severe
1 Rare	1	2	3	4	5
2 Unlikely	2	4	6	8	10
3 Possible	3	6	9	12	15
4 Likely	4	8	12	16	20
5 Almost certain	5	10	15	20	25

Colour	Band	Meaning
Green	Low (1-5)	Accept with standard controls.
Amber	Medium (6-11)	Accept with documented additional checks and 12-monthly review.
Orange	High (12-18)	EDD and MLRO approval required; documented action plan.
Red	Very High (19-25)	Presumption of refusal; board approval, continuous monitoring, consider SAR.

APPENDIX B

Client risk assessment form (template)

Complete for every seller and every buyer before an introduction proceeds. Retain on the client file for five years.

Field	Entry
Client name	
Client type (individual / company / SPV / trust / overseas entity)	
Role (seller / buyer / both)	
Deal reference and property address	
Date of instruction / registration	
Identity verified — method, date, verifier	
Beneficial owners >25% identified and verified (list)	
Companies House / ROE checked — discrepancy reported? (Y/N)	
PEP screening result and date	
Sanctions screening result and date	
Adverse media result and date	
Funding method (cash / mortgage / bridging / JV)	
Source of funds — description and evidence held	
Source of wealth — description and evidence held (High risk only)	
Geographic risk factors	
Delivery channel (face-to-face / remote / introducer)	
Red flags observed (see Appendix C)	
Likelihood score (1-5)	
Impact score (1-5)	
Inherent score and band	
Control effectiveness (Strong/Adequate/Weak)	
Residual rating (Low / Medium / High / Very High)	
Level of due diligence applied (SDD / CDD / EDD)	
MLRO approval required? Obtained? Date	
Next review date	
Assessed by — name, role, signature, date	

APPENDIX C

Red-flag indicators for property sourcing

The following are not conclusive of criminality, but each requires enquiry and, where unresolved, an internal suspicion report.

Client behaviour

- Reluctance or refusal to provide identity, beneficial ownership or funding information, or repeated excuses for delay.
- Unusual eagerness to complete at speed with no commercial reason, or willingness to lose a deposit to avoid scrutiny.
- Requests for unusual secrecy, use of nominees, or instructions to leave a name off documentation.
- The client appears to be acting on someone else's instructions or shows limited knowledge of their own transaction.
- Identity documents that appear altered, inconsistent, or that fail electronic verification without a credible explanation.

Funding and value

- Offer of cash or cryptoassets for the sourcing fee, or funds offered from a third party with no explained relationship.
- Funds arriving from multiple accounts, multiple jurisdictions, or accounts not in the client's name.
- Purchase price materially above or below market value with no commercial rationale.
- Wealth that is disproportionate to the client's stated occupation, age or business activity.
- Overpayment followed by a request for a refund to a different account.

Structure and transaction

- Layered ownership through offshore companies, trusts or nominee shareholders with no evident business purpose.
- Rapid resale, back-to-back sales or repeated assignments of the same contract.
- The buyer or seller changes late in the process without explanation.
- The property will not be occupied, let or used, and has no evident investment logic.
- An overseas entity acquiring UK land that is not registered on the Register of Overseas Entities.

Vendor-side

- Signs of duress, undue influence, diminished capacity, or a vendor who declines independent legal advice.
- Title inconsistencies, recent unexplained changes to the register, or a vendor who cannot evidence occupation or ownership.
- A distressed vendor pressed to accept an unusually low price by an unidentified third party.

APPENDIX D

Internal suspicion report form (template)

CONFIDENTIAL — deliver to the Nominated Officer only. Do not copy, discuss or retain on the client file. Do not inform the client or any third party that this report has been made.

Section	To complete
Reporter name and role	
Date and time of report	
Client / subject name(s) and date of birth	
Deal reference and property address	
Other parties involved	
Description of the activity or circumstances giving rise to suspicion	
Why it is considered suspicious (facts, not assumptions)	
Amounts and dates involved	
Documents or evidence attached	
Has the client been told anything? (must be 'No')	
Has the transaction completed or is it pending?	
Reporter signature	

For completion by the Nominated Officer

Section	To complete
Date received	
Enquiries made and information reviewed	
Analysis and conclusion	
Decision: report to NCA / do not report — with reasons	
SAR reference and submission date (if reported)	
DAML requested? Consent given / refused / deemed — dates	
Moratorium end date (if applicable)	
Action taken on the relationship (continue / exit / decline)	
Nominated Officer signature and date	

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