



# ANTI-MONEY LAUNDERING POLICY

January 2023



**Key individuals involved in developing the process and policy.**

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Tina Goodship	Head of Finance and Company Secretary

**Circulated to the following individuals for comments and approval.**

Name	Job Title
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### 1.0. Introduction

1.1. This policy applies to all Citrus Group employees and aims to maintain existing high standards of conduct within the Company by preventing criminal activity through money laundering.

1.2. The Terrorism Act 2000, The Proceeds of Crime Act 2002 and The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, place obligations on the Company and its employees with respect to suspected money laundering. This policy sets out the procedures that must be followed to enable the Company to comply with its legal obligations.

1.3. The key message of this policy is that if you suspect that money laundering activity may be taking place, or proposed, in relation to anything you are dealing with, you should immediately disclose those suspicions to the Company's Money Laundering Reporting Officer. If the matter involves a proposed transaction, you should not proceed with the transaction without approval from the Money Laundering Reporting Officer.

1.4. The Company's Money Laundering Reporting Officer (MLRO) is Tina Goodship (Head of Group Finance and Company Secretary). She can be contacted as follows:

Citrus Group House,  
Diamond Way,  
Nene Park,  
Irthlingborough,  
Northamptonshire,  
NN9 5QF.

Telephone 03332 07 66 11 Ext. 2324

Mobile 07525 796382

Email [tina@thecitrusgroup.org](mailto:tina@thecitrusgroup.org)

1.5. In the absence of the MLRO Karen Shickell is authorised to deputise for her and can be contacted at [karens@thecitrusgroup.org](mailto:karens@thecitrusgroup.org) or by phone on 03332 07 66 11.

### 2.0 What is Money Laundering?

2.1. Money laundering is the process by which the proceeds of crime or terrorism are changed, so that they appear to come from a legitimate source.

2.2. The Proceeds of Crime Act 2002 defines the main money laundering offences as follows:

- Concealing, disguising, converting, transferring or removing criminal property from the UK;
- 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;
- Acquiring, using or possessing criminal property;
- Doing something that might prejudice an investigation, for example, falsifying a document, or tipping off a person who is suspected of being involved in money laundering in such a way as to reduce the likelihood of, or prejudice, an investigation; and
- Failure to disclose one of the offences listed above where there are reasonable grounds for knowledge or suspicion.

2.3. Potentially any employee could 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.

### 3.0 Employee Responsibilities

3.1. All employees must be familiar with their legal responsibilities and should note that serious criminal sanctions may be imposed for breaches of the legislation.

3.2. All employees have a duty to follow the guidance in this policy and to report any suspicious activity to the MLRO.

3.3. Failure by an employee to comply with the procedures set out in this policy may lead to disciplinary action being taken against them. Any disciplinary action will be dealt with in accordance with the company's Disciplinary Policy, as detailed in the Employee Handbook.

### 4.0 Company Responsibilities

4.1. The Company has a responsibility to:

- Appoint a MLRO to receive, consider and report as appropriate, disclosure of suspicious activity reported by employees;
- Implement a procedure to enable the reporting of suspicious activity;
- Maintain customer identification procedures to 'know your customer', in relevant circumstances; and
- Maintain adequate records of transactions.

### 5.0 Disclosure Procedure - Employees

5.1. Where you know, or suspect, that money laundering activity is taking/has taken place or become concerned that your involvement in a matter may be in breach of the legislation, you must disclose this as soon as practicable to the MLRO.

5.2. Your disclosure report should include the following information, along with any relevant supporting documentation:

- Full details of the people involved, e.g. name, date of birth, address, company name, directorships, phone numbers, etc.
- Full details of the nature of their/your involvement in the transaction(s).
- The types of money laundering activity involved.
- The dates of such activities, including whether the transaction(s) have happened, are on-going or are imminent.
- Where the activities took place.
- How the activities were undertaken.
- The amount of money/assets involved.
- Why, exactly, you are suspicious.

5.3. Once the matter has been reported to the MLRO, you must follow any advice given by the MLRO and must NOT make any further enquiries into the matter yourself.

5.4. You must not voice any suspicions to the person(s) whom you suspect of money laundering without the specific consent of the MLRO, otherwise you may commit a criminal offence of 'tipping off' the person(s) suspected of money laundering.

5.5. You must not make any reference on a client/supplier file to a report having been made to the MLRO in case the file is made available to the individual/company suspected of money laundering. This will in effect 'tip them off' to the report being made and may render you liable to prosecution. The MLRO will keep the appropriate records confidentially.

### 6.0 Disclosure procedure – MLRO

6.1. On receipt of a disclosure report the MLRO will:

- Note the date of receipt and acknowledge receipt of it.

- Assess and advise the individuals concerned when a response can be expected.
- Consider the report and any other relevant information and decide if a report should be made to the National Crime Agency (NCA).

6.2. Once the MLRO has evaluated the disclosure report and any other relevant information, they must determine, in a timely manner whether:

- There is actual or suspected money laundering taking place and that there are reasonable grounds for this suspicion/knowledge;
- They need to seek consent from NCA for a particular transaction to proceed.

6.3. 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 specifically given consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.

6.4. Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then they shall mark the report accordingly and give their consent for any ongoing or imminent transaction(s) to proceed.

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

## 7.0 Know Your Customer

7.1. It is important that all due diligence controls that have been put in place by the Company are followed to ensure that we 'know our customer'. These measures include:

- Verifying customer provided documentation;
- Checking information about the customer from reliable and independent sources.

7.2. Any unusual activity during the customer due diligence process should be reported, without delay, to the MLRO.

7.3. To reduce the risk to the Company of our customers undertaking any money laundering activities, Citrus Group will not do business with the following potential customers:

- Persons included in any official lists of sanctions;
- Persons indicating possible involvement in criminal activities;
- Persons with businesses in which the legitimacy of activity or source of funds cannot be reasonably verified;
- Persons refusing to provide the required information or documentation;
- Entities whose shareholder/control structure cannot be determined.

## 8.0 Identification of Potential Money Laundering Situations

8.1: The following is a list of possible red flags that may arise while you work for us and which may raise concerns related to tax evasion or foreign tax evasion. The list is not intended to be exhaustive and is for illustrative purposes only.

8.2: If you encounter any of these red flags while working for us, you must report them promptly to your line manager or a member of the Senior Management Team:

8.2.1: You become aware, in the course of your work, that a third party has made or intends to make a false statement relating to tax; has failed to disclose income or gains to, or to register with, HMRC (or the equivalent authority in any relevant non-UK jurisdiction); has delivered or intends to deliver a false document relating to tax; or has set up or intends to set up a structure to try to hide income, gains or assets from a tax authority.

8.2.2: You become aware, in the course of your work, that a third party has deliberately failed to register for VAT (or the equivalent tax in any relevant non-UK jurisdiction) or failed to account for VAT.

8.2.3: A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.

8.2.4: You become aware, in the course of your work, that a third party working for us as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions.

8.2.5: A third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.

8.2.6: A third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to such entity directly.

8.2.7: A third party to whom we have provided services asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided.

8.2.8: You receive an invoice from a third party that appears to be non-standard or customised.

8.2.9: A third party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated.

8.2.10: You notice that we have been invoiced for a commission or fee payment that appears too large or too small, given the service stated to have been provided.

## 9.0 Record Keeping

9.1. Each area of the Company conducting relevant business must maintain records of the following so they can be used as evidence in any subsequent investigation by the authorities:

- Client identification evidence obtained; and
- Details of all relevant business transactions carried out for clients for at least 5 years.

Signed:



Date: 01/11/2022

**Wayne Taylor**  
(Managing Director)