# Firm Wide Risk Assessment

Estate agents are regulated by H Laundering Regulations 2017 a Financing (Amendment) Regulation to have a risk assessment in plan risks the business is exposed to for

This risk assessment was car Organisation>> Money Laundering

In preparing this Risk Assessment

- 1. taken into account all guida
- taken into consideration a national risk assessment, a risk third countries;
- [<< The Organisation>>ha history of reports of suspic
- 4. [<<Other>>]

This assessment will be reviewed

[Signature of MLRO]

[Date]

- <<The Organisation>> ca Section 1 of the Es introducing/negotiating wit property including comment where this is done in the customer.
- Overall Risk Assessment: [Add here a summary high
- << The Organisation>> is exposed to the following ris

THE BELOW ARE EXAM YOUR SPECIFIC PRACTI S

A

ess must comply with the Money loney Laundering and Terrorist ns') which requires estate agents Organisation>> has identified the terrorism financing.

name of MLRO>> the <<The insert date>>.

has:

de available to them from HMRC; ring legislation, the HM Treasury anctions list and latest list of high-

ctices and file reviews and any

ary.

P

y work' which is defined under 79 as work which includes buy or sell freehold or leasehold rty (whether in the UK or abroad) d pursuant to instructions from a

[HIGH] risk.

risk for the Organisation].

out Estate Agency Work which is ng and terrorism financing:

T TAILOR THIS TEMPLATE TO

#### Sales

#### [Risks:

- Individuals may p ownership of the receive the sale pro
- <<Other>>].

This specific risk is judged why the risk is [low/mediur customers and instructions

Add here what steps the posed; for example, all r identity of all customers w and if high-risk, enhanced

#### **Purchases**

# [Risks:

- Property can be pu into 'clean money'.
- <<Other>>].

This specific risk is judged why the risk is [low/mediur customers and instructions

[Add here what steps the posed; for example, the id must be verified for those due diligence must be cal party and its beneficial owl

# Cash

## [Risks:

- Customers may wis payments may be i
- <<Other>>].

This specific risk is judged why the risk is [low/mediur customers and instructions

ation as to their identity and rty which they don't own and

because <<state the reasons carried out, the Organisation's

in place to mitigate the risks approved by the MLRO, the ers deemed low or medium risk rried out.

roceeds to change 'dirty money' ls from terrorism activities.

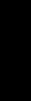
n] because<<state the reasons carried out, the Organisation's

in place to mitigate the risks party and its beneficial owners risk and if high-risk, enhanced d verification of the contracting off by the MLRO].

eds in our account and/or cash

because <<state the reasons carried out, the Organisation's





[Add here what steps the posed; for example, the ad there is a limit on the amount of there is a limit on the amount of the posed in the posed; for example, carrying approve new customers].

S

in place to mitigate the risks MLRO and one other partner, if accepted from the customer].

A

sociates are seen as high risk d therefore they are more likely

] because <<state the reasons carried out, the Organisation's

in place to mitigate the risks gence and getting the MLRO to

# Mortgage Fraud

# [Risks:

- Mortgage Fraud od mortgage.
- Criminals may mis greater loan than th
- Organised crime sy and fail to make an
- <<Other>>].

This specific risk is judged why the risk is [low/mediur customers and instructions

[Add here what steps the posed; for example, the id must be verified for those due diligence must be call party and its beneficial own

# Corporate Vehicles and

### [Risks:

 Customersmay us proceeds and to ev de false information to obtain a or property value to obtain a properties, using false identities

] because <<state the reasons carried out, the Organisation's

in place to mitigate the risks party and its beneficial owners risk and if high-risk, enhanced d verification of the contracting off by the MLRO].

companies to hide criminal



Property deals mapportioning the pu

<<Other>>].

This specific risk is judged why the risk is [low/mediur customers and instructions

[[Add here what steps th posed; for example, identified where there are complex also be signed off by the Market in the steps of the step of the step of the steps of the step of the step

Trusts

#### [Risks:

- Customersmay use
- <<Other>>].

This specific risk is judged why the risk is [low/mediur customers and instructions

[Add here what steps the posed; for example, ident trustees and settlor, the i MLRO, staff training and u and whether this fits with v

#### **Staff**

#### [Risks:

- Dishonest membel carry out money lat
- <<Other>>].

This specific risk is judged why the risk is [low/mediur customers and instructions

[Add here what steps the posed; for example, re Laundering, regular review of the account].

as to avoid tax (for example ving Stamp Duty Land Tax)].

n] because<<state the reasons carried out, the Organisation's

in place to mitigate the risks dentity of all beneficial owners], e identity and verification must

criminal proceeds.

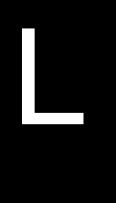
h] because<<state the reasons carried out, the Organisation's</li>

in place to mitigate the risks dentity of all beneficial owners, nust also be signed off by the and purpose of the transaction customer].

firm's bank account details to

h] because<<state the reasons</li>carried out, the Organisation's

in place to mitigate the risks staff training on Anti-Money O can approve transactions out



# Geographical Areas of ope

# [Risks:

- Customers may not l come from high-risk j of corruption.
- It is not possible to m
- Payments may need accounts.
- <<Other>>].

This specific risk is judged t why the risk is [low/mediumh customers and instructions re

[Add here what steps the oposed; for example, what syshigh-risk third countries, ho additional checks would need

[Other]

S

Δ

because<<state the reasons

arried out, the Organisation's

o third parties from overseas

erseas sellers or buyers may

x havens or have high levels

rs face to face.

place to mitigate the risks as in place for staff to identity tions are in place and what