

Firm Wide Risk Assessment

Estate agents are regulated by HM Treasury Money Laundering Regulations 2017 and the Terrorism Financing (Amendment) Regulations 2018. The Organisation must have a risk assessment in place to identify the risks the business is exposed to from money laundering and terrorism financing.

This risk assessment was carried out by <<The Organisation>> Money Laundering and Terrorism Financing Risk Assessment Team.

In preparing this Risk Assessment the following has been taken into account:

1. taken into account all guidance issued by HMRC;
2. taken into consideration all relevant legislation, the national risk assessment, and the list of high-risk third countries;
3. [<<The Organisation>> has a history of reports of suspicious activity];
4. [<<Other>>]

This assessment will be reviewed annually.

.....
[Signature of MLRO]

.....
[Date]

1. <<The Organisation>> carries out Estate Agency Work as defined under Section 1 of the Estate Agents Act 1979, which includes introducing/negotiating with potential buyers or sellers of property including commercial property where this is done in the course of business with a customer.
2. Overall Risk Assessment: [Add here a summary high risk for the Organisation].
3. <<The Organisation>> is exposed to the following risks from money laundering and terrorism financing:

THE BELOW ARE EXAMPLES OF RISKS THAT YOU MUST TAILOR THIS TEMPLATE TO YOUR SPECIFIC PRACTICE

The Organisation must comply with the Money Laundering Regulations 2017 and the Terrorism Financing (Amendment) Regulations 2018 which requires estate agents (<<The Organisation>>) to have a risk assessment in place to identify the risks the business is exposed to from money laundering and terrorism financing.

This risk assessment was carried out by <<The Organisation>> the <<The Organisation>> Money Laundering and Terrorism Financing Risk Assessment Team on <<insert date>>.

In preparing this Risk Assessment the following has been taken into account:

1. taken into account all guidance issued by HMRC;
2. taken into consideration all relevant legislation, the national risk assessment, and the list of high-risk third countries;
3. [<<The Organisation>> has a history of reports of suspicious activity];
4. [<<Other>>]

This assessment will be reviewed annually.

The Organisation carries out Estate Agency Work which is defined under Section 1 of the Estate Agents Act 1979 as work which includes introducing/negotiating with potential buyers or sellers of property (whether in the UK or abroad) in the course of business with a customer and pursuant to instructions from a customer.

Overall Risk Assessment: [HIGH] risk.

The Organisation is exposed to the following risks from money laundering and terrorism financing:

<<The Organisation>> is exposed to the following risks from money laundering and terrorism financing:

THE BELOW ARE EXAMPLES OF RISKS THAT YOU MUST TAILOR THIS TEMPLATE TO YOUR SPECIFIC PRACTICE

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Sales**[Risks:**

- *Individuals may purchase property as to their identity and ownership of the property which they don't own and receive the sale proceeds*
- *<<Other>>].*

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

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

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

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

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

Purchases**[Risks:**

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

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

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

proceeds to change 'dirty money' ds from terrorism activities.

n] because<<state the reasons k 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].

Cash**[Risks:**

- *Customers may wish payments may be received*
- *<<Other>>].*

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

[Add here what steps the

needs in our account and/or cash

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

in place to mitigate the risks

<p>posed; for example, the ad there is a limit on the amou</p>		<p>MLRO and one other partner, if accepted from the customer].</p>
<p>Politically Exposed Perso</p> <p>[Risks:</p> <ul style="list-style-type: none"> • PEPs or their fam due to their positio to be involved in br • <<Other>>]. <p>This specific risk is judged why the risk is [low/mediu customers and instructions</p> <p>[Add here what steps the posed; for example, carryi approve new customers].</p>		<p>associates are seen as high risk and therefore they are more likely</p> <p>] because <<state the reasons k carried out, the Organisation's</p> <p>in place to mitigate the risks gence and getting the MLRO to</p>
<p>Mortgage Fraud</p> <p>[Risks:</p> <ul style="list-style-type: none"> • Mortgage Fraud oc mortgage. • Criminals may mis greater loan than th • Organised crime sy and fail to make an • <<Other>>]. <p>This specific risk is judged why the risk is [low/mediu customers and instructions</p> <p>[Add here what steps the posed; for example, the id must be verified for those due diligence must be ca party and its beneficial ow</p>		<p>de false information to obtain a</p> <p>or property value to obtain a</p> <p>properties, using false identities</p> <p>] because <<state the reasons k carried out, the Organisation's</p> <p>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].</p>
<p>Corporate Vehicles and T</p> <p>[Risks:</p> <ul style="list-style-type: none"> • Customers may t proceeds and to ev 		<p>companies to hide criminal</p>

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

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

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Geographical Areas of operation

[Risks:]

- *Customers may not be known or come from high-risk areas or areas of corruption.*
- *It is not possible to verify the identity of customers.*
- *Payments may need to be made through third party accounts.*
- *<<Other>>].*

This specific risk is judged to be [low/medium/high] because [state the reasons why the risk is [low/medium/high] and the controls in place to mitigate the risk].

[Add here what steps the Organisation has in place to mitigate the risks posed; for example, what steps are in place for staff to identify high-risk third countries, what additional checks would need to be carried out, etc.]

[Other]

Overseas sellers or buyers may come from tax havens or have high levels of corruption.

Customers may face to face.

Payments may be made to third parties from overseas accounts.

[state the reasons why the risk is [low/medium/high] because<<state the reasons why the risk is [low/medium/high] and the controls in place to mitigate the risk].

in place to mitigate the risks posed; for example, what steps are in place for staff to identify high-risk third countries, what additional checks would need to be carried out, etc.]