



ANTI MONEY LAUNDERING POLICIES & PROCEDURES

POLICY STATEMENT/OVERVIEW SECTION

Elite Services Limited, Carsville Coaches Limited, Elite Services Driver Training Limited, Elite Services Home to School Transport & Freedom Travel North T/A Smiths of Marple Limited take a zero tolerance approach to being involved in illegal/illicit activity, and will fully comply with all relevant sections of the Money Laundering Regulations 2017 (ML Regs) (as amended by the MLR 2019), the Proceeds of Crime Act 2002 (POCA), and the Terrorism Act 2000 (TACT).

All Directors and employees of the company are under an obligation and duty bound to comply with the above. This policy & any related procedures aims to help directors and staff fulfil these responsibilities, by providing a clear framework, along with setting out the firm's key principles and obligations.

- Failure to fulfil these responsibilities may result in disciplinary action and may also result in criminal sanctions for the staff involved.
- Breaches may also be reportable to Samuel Nickson, Director, who is responsible for overseeing AML breaches. Such breaches may result in professional disciplinary action.
- Furthermore, a Suspicious Activity Report (SAR) may also have to be made to the National Crime Agency (NCA) or other law enforcement agencies, which may result in a criminal investigation.

AML LEGISLATIVE FRAMEWORK SECTION

Responsibilities under relevant legislation include:

ML REGS 2017 / 2019:

- Risk Based Assessment
- Customer Due Diligence, including ID&V requirements, assessing Source of Wealth, and application of KYC information
 - Enhanced Due Diligence & Ongoing Monitoring (incl. definition and treatment of PEPs)
- Money Laundering Reporting Officer (MLRO) Responsibilities, SAR Reporting, Tipping Off, Police Orders
- Quality Assurance
- AML Record Keeping
- AML Training
- Compliance with International Sanctions Requirements

POCA 2002/TACT 2000: MLRO responsibilities, Suspicious Activity Reporting, Tipping Off & Police Orders

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Key responsibilities of staff therefore include *(but are not limited to)*:

- Conducting an adequate risk assessment and appropriate due diligence (CDD) on clients and transactions, including PEP and sanctions checking.
- Monitoring all clients/transactions on an ongoing basis for potential money laundering or terrorist financing activity;
- Reporting any suspicious activity in respect of client or transactions to the MLRO in accordance with the firms SAR (suspicious activity reporting)procedure;
- Avoiding discussing any potential or actual SARs with clients or any third parties (“Tipping off”)
- Referring any Police/Law Enforcement queries or requests to the MLRO ;
- Undertaking any AML-related training provided by the Company
- Keeping appropriate records of all AML related activity

COMPANY RISK PROFILE SECTION

The Director believes **Elite Services Limited, Carsville Coaches Limited, Elite Services Driver Training Limited, Elite Services Home to School Transport & Freedom Travel North T/A Smiths of Marple Limited** are at **low** risk of being used to launder the proceeds of crime. This is based on the following factors:

- Coach Operator within the transportation industry.
- A stable existing client base and new customers are required to provide full details for invoicing from a UK business or a residential address.
- High proportion of clients are registered business or a school.
- Low amount of cash transactions taken.

RISK BASED ASSESSMENT SECTION

- Samuel Nickson, Director is responsible for the Anti-Money Laundering Risk Assessment (see below). **Elite Services Limited, Carsville Coaches Limited, Elite Services Driver Training Limited, Elite Services Home to School Transport & Freedom Travel North T/A Smiths of Marple Limited** use a Client and Matter Risk Assessment for individual clients if required.
- Individual AML Risk Assessments are reviewed annually unless a significant risk is presented to the company.
- Client’s requiring the use of the Company’s services who are based abroad must make payment before work is undertaken and the source of the funds checked by the Director.
- If the client is deemed as high risk or suspicious activity is suspected, the Director will submit a Suspicious Activity Report to the National Crime Agency e.g. a transaction from a third party and not the client

CUSTOMER DUE DILIGENCE PROCEDURES SECTION

- The Director, Operations Manager or Office Manager are responsible for undertaking a new client’s ID checks and Risk Analysis. The person undertaking the check should complete the Client Risk Assessment and report to the Director if the check is deemed as high risk.

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- ID Checks include being able to produce personal official ID such as a valid Driving Licence or Passport for individual clients or in the instance of Company's; being able to supply the full business information including the Company's Business Registration Number, and Business Address.

Politically exposed persons (PEPs)

The firm will apply enhanced and ongoing due diligence to all PEP clients and will consider and assess the heightened risk of undertaking business with or on behalf of PEPs, particularly the risk of laundering the proceeds of corruption.

What is a PEP?

- A "politically exposed person" (PEP) is a term describing someone who has been entrusted with a prominent public function.
- A PEP generally presents a higher risk for potential involvement in bribery and corruption by virtue of their position and the influence that they may hold. Positions may include:
 - Head of state, heads of government, ministers and deputy or assistant ministers
 - Members of parliament
 - Members of supreme courts, of constitutional courts, or of other high-level judicial bodies – members of courts of auditors or of the boards of central banks
 - Ambassadors, charges d'affairs and high-ranking officers in the armed forces
 - Members of the administrative, management or supervisory bodies of state-owned enterprises

The definition of a PEP also extends to:

- family members of a PEP – spouse, partner, children and their spouses or partners, and parents
- known close associates of a PEP – persons with whom joint beneficial ownership of a legal entity or legal arrangement is held, with whom there are close business relationships, or who is a sole beneficial owner of a legal entity or arrangement set up by the primary PEP

Should circumstances or information arise to suggest that a client is a PEP (or a corporate client is owned/controlled by a PEP) the Company should ask the client additional questions to determine PEP status, and use open source information to verify.

International Sanctions Checking

The fee earner will conduct a sanctions list check on each new client via the HM Treasury website (or an electronic verification system if used) to check if the client or source of funds is related to a sanctioned jurisdiction/regime, and conduct ongoing checks periodically (*at least annually for all clients*)

- <https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets>

MLRO RESPONSIBILITIES/ SUSPICIOUS ACTIVITY REPORTING SECTION

The MLRO of the Firm is Samuel Nickson, Director responsible for all business decisions made.

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He is responsible for:

- Scrutiny of unusual transactions highlighted to him within 24 hours of receiving the initial report from the reporting member of staff.
- Ultimately deciding if a client is to be taken on where there is a high risk of money laundering
- Reviewing SARs made from employees – and then deciding when to submit the information and report to the NCA.
- Ensuring that any report submitted to him (and subsequently the NCA) contains a full conducted Risk Assessment highlighting why there is suspicion of money laundering and any evidence to substantiate the claim.
- Deal with any contact from the Police
- Ensure that the member of staff who has conducted the assessment and determined the high risk is given full support in the event that the matter is taken further. This should include anonymity if possible.
- Ensure all staff trained to level appropriate to their role

QUALITY ASSURANCE SECTION

The company should ensure that any AML's assessment's are audited by either the Director, Senior Operations Manager or Office Manager every 3 months.

AML RECORD KEEPING SECTION

Any AML material should be retained on file for a minimum of 5 years. All material should be kept in a secured location not accessible to the public or members of staff who are not given authorisation by the Director.

AML TRAINING SECTION

Any staff member who is responsible for undertaking AML checks should be given full training on how to conduct a check and the types of verification that are accepted.

Training should be given face to face with supporting notes given as a reference point. Refresher training should be made freely available if required or identified as a training need.

Any updates that affect the Company and the risk factors should be communicated to the relevant staff members in writing and an additional verbal check made to check understanding of that may affect the process.

FURTHER INFORMATION

[Anti-Money Laundering Regulation and Guidance - CILEx Regulation](#)
POCA 2002

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[Proceeds of Crime Act 2002 \(legislation.gov.uk\)](https://legislation.gov.uk)

ML Regs 2017

[The Money Laundering, Terrorist Financing and Transfer of Funds \(Information on the Payer\) Regulations 2017 \(legislation.gov.uk\)](https://legislation.gov.uk)

ML (Amendment) Regs 2019

[The Money Laundering and Terrorist Financing \(Amendment\) Regulations 2019 \(legislation.gov.uk\)](https://legislation.gov.uk)

Legal Sector Affinity Group AML Guidance 2021

[LSAG-AML-Guidance.pdf \(cilexregulation.org.uk\)](https://cilexregulation.org.uk)

VERSION CONTROL:

Date	Change	Name

Client and Matter Risk Assessment

The factors posed on the following pages should be considered when assessing the risk of the client and/or the transaction. Please use the notes column to summarise observations/assessment of risks involved where the issue is applicable to the client/transaction being considered. You must record a client risk assessment for every client as part of Client Due Diligence. Not all questions will be relevant or applicable to all situations and, conversely, the questions outlined are non-exhaustive.

Client Risk Assessment	Analysis/Notes
Status of Client - Is your client known to you personally and/or is an existing client, or is this a new business relationship? • Has your client been introduced to you by a 3rd Party? - Is the instruction from your client channelled through a 3rd party? If so, why? - Is your client a politically exposed person (PEP)? - Does your client work in a higher risk sector (for example sectors such as unregulated charities/arms manufacturing/gambling)? - If your client is not a natural person but rather a legal entity, do you have full visibility and ID&V of beneficial owners and directors / controllers? - Are there any issues in identifying the beneficial owners (for example if a complex corporate structure is being used)?	
Face to Face Contact	

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• Have you met with your client face to face or is it a non-face to face transaction? • If non face to face, are you confident that you can mitigate the risks of fraud? • If non-face to face what measures have you implemented to be assured of their identity?	
Location of Client • Where is your client based? Locally/UK/EU/other international location? • Are you aware of your client having any links to criminality? • Is your client based in a high-risk jurisdiction or resident in/links to a sanctioned country? (please see the LSAG Guidance at page 40 for a list of factors).	
ID & Address Verification • Has your client provided acceptable standard ID and address verification? • Has your client provided acceptable non-standard ID and address verification? • If using s.39 reliance (obtaining certified copies of ID & address verification – 2017 Regs), have you been able to confirm the authenticity/professional status of the certifier? • Has your client been cooperative in the process or have they delayed providing ID and address verification / appeared reluctant to do so?	
Electronic AML Checking • Has an electronic AML check been undertaken on either the client or the company if a commercial transaction? • If the result of the electronic AML check was “fail” or “refer” what steps has the practice taken to address this?	
Financial Profile of Client • Does the stated source of wealth / source of funds and the amount of money involved reconcile with what you know of your client, for example given their age and occupation? • Do you need further source of wealth information for the client?	

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Is your client involved in / run a high risk or high cash turnover business?	
Transaction Type - Does the transaction make sense or is it overly complex given the underlying nature of the business being conducted? - Is the matter undertaken at short notice, within a short timescale or involving high volumes? - Is there an unusual pattern of instructions or do the transaction/ transactions have no apparent economic or legal purpose? - Is the matter routine for the practice, and if not does a lack of experience or expertise add to the risk? - Does it make sense that your client has asked your firm to carry out this type of transaction? (e.g. is it within your area of expertise/local geographical area?) - Does the matter involve trust or other legal entity company formation, management or service provision? - Are there any other red flags identified?	
Source of Funds - Is the source of funds clear and identifiable? - Are there any elements of the source of funds which are unexplained? - Is any funding coming from overseas? Where from? Who from? Connection to client? - Are any of the funds being paid by a third party otherwise unconnected to the transaction? - Does your client seek to change the source of funds at the last minute? - Has your client paid excess funds into your client account? Why/How? - Does the value of the transaction appear to fall within the financial means of your client, given their income and savings? - Does the funding derive from the sale of commodities or include new sources of finance which are unregulated such as crowd funding platforms or some bitcoins/cryptocurrencies? (Note that the FCA now maintains a temporary register of	

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some cryptocurrency organisations and is regulating them).	
Destination of Funds - Has your client requested that fee proceeds be paid to someone other than a lender or themselves? - If so what is the reason provided for this? - Are fee proceeds to be paid to an overseas account? - Has your client changed the destination of funds during the transaction?	
Automatic High-Risk Triggers - Are any automatic high-risk triggers for the Practice present? (such as the client being resident in a high-risk jurisdiction) - Have any funds been deposited into your account without permission? - Are there any factors present which would require an internal suspicion report to be submitted to the MLRO?	

Money Laundering Risk Assessment – File Note

This should be completed at the beginning of the transaction, during the transaction if anything changes and just before the transaction is completed. Assessment of risk should take both client and transaction risk into consideration and will dictate whether Standard or Enhanced Client Due Diligence (EDD) is required. Please see page 49-50 of the LSAG guidance for a detailed guide to risk weightings.

Initial Assessment Of Risk	☐ LOW (Standard CDD)	☐ MEDIUM (Standard CDD)	☐ HIGH (Enhanced EDD)
Please state the reasons for your assessment: If HIGH Risk, please explain the additional steps to be taken under EDD: Is an internal suspicion report justified?			
Signed By:	Date:		

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Interim Risk Assessment - Have any risk factors changed?	☐ LOW (Standard CDD)	☐ MEDIUM (Standard CDD)	☐ HIGH (Enhanced EDD)
Please state the reasons for your assessment: <i>If no, quick note stating as such, signed and dated – evidence that a review has been undertaken and consideration has been made)</i> Is an internal suspicion report justified?			
Signed By:		Date:	

Final Risk Assessment – Have there been any last minute changes that give cause for concern?	☐ LOW (Standard CDD)	☐ MEDIUM (Standard CDD)	☐ HIGH (Enhanced EDD)
Please state the reasons for your assessment: <i>(Should be undertaken before monies are transacted/enter the client A/C)</i> Is an internal suspicion report justified?			
Signed By:		Date:	

If you have assessed the risk as high at any point during the transaction or have any reservations or concerns, please refer to the MLRO before continuing to act for the client. If the nature of the transaction, the documentation or information you have been given would have aroused suspicions for a reasonable and honest Authorised Person, then you must immediately make an internal suspicion report in writing.

Last Review: 8th October 2026

Next Review: 8th October 2027