

Anti Money Laundering Policy

Updated: November 2018

Owner: Group Company Secretarial

Our Position

We will take measures to prevent the company and its officers being exposed to money laundering, to identify areas in which money laundering may occur and to comply with legal and regulatory requirements. It is the responsibility of every employee to be vigilant and act promptly in all suspected cases.

What is Money Laundering?

Money laundering is the term used when referring to activities designed to conceal or transform the profits from illegal activities and corruption into ostensibly "legitimate" assets.

We believe that there is a low risk of our Group being used as a means of money laundering.

What You Need to Do

- Be vigilant for signs of money laundering
- Do not accept cash payments in excess of £ 10,000 (or equivalent currency in your local jurisdiction)
- Be careful of any transaction involving an unusually large amount of cash or deposits of unusual sums into a customer account
- Be careful of overpayments and double payments where the person(s) concerned request a non-cash refund of the excess
- Commercial customers should be subject to a screening processes to ensure that legal entities are legitimate
- If you suspect any money laundering activity you must report this promptly to the Company Secretary (see reporting form attached)

Reporting

- The Money Laundering Reporting Officer (MLRO) nominated to receive disclosures about money laundering activity is the Company Secretary who will deal with all disclosures in confidence and make decisions on reporting the activity to the National Crime Agency (NCA) in the appropriate manner. All reports will be retained for five years.



[Get in touch 01603 281800](tel:01603281800) or help@nakedwines.com

All Group Policies are intended to set out the minimum principles to which the Group subscribes – where necessary, local companies should adjust policies to take into account local requirements, specifically local currencies where amounts are stipulated

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*Please apply a local relevant value if outside the UK.

- Any employee who suspects a money laundering activity should report their suspicions promptly to the MLRO using the form attached, whereafter you may be contacted directly to discuss the content of the report as required.
- Following a report, no further steps in any transaction relating to the suspected money laundering should be made without authorisation from the MLRO. For example, if repeated large cash payments are received to a specific account seek guidance before accepting payment.
- No disclosure should be made to others that would indicate your suspicions of money laundering. You should not discuss the matter with others or note on file that a report has been made as this may result in the suspect becoming aware of the situation.



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For completion by the employee suspicious of money laundering activity

CONFIDENTIAL

Report to Money Laundering Reporting Officer - money laundering activity

To: Money Laundering Reporting Officer

From: _____
[insert name of employee]

Role: _____
[insert post title and business unit]

Ext/Tel No: _____

Details of suspected offence:

Names(s) and address(es) of person(s) involved:

Nature, value and timing of activity involved:

[Please include full details eg what, when, where, how. Continue on a separate sheet if necessary]



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Nature of suspicions regarding such activity:
[Please continue on a separate sheet if necessary]

Have you disclosed your suspicions to anyone, or sought advice from anyone?

Signed: _____ Dated: _____

This report is confidential. Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. **To do so may constitute a tipping off offence, which carries a maximum penalty of five years' imprisonment.**



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For completion by the Money Laundering Reporting Officer (MLRO)

Date report received: _____

Date receipt of report acknowledged: _____

CONSIDERATION OF DISCLOSURE:

Action plan:

OUTCOME OF CONSIDERATION OF DISCLOSURE:

Are there reasonable grounds for suspecting money laundering activity?

If there are reasonable grounds for suspicion, will a report be made to NCA? [Please tick the relevant box] Yes No

If yes, please confirm date of report to NCA: _____ and complete the box below:



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Details of liaison with NCA regarding the report:

Notice period: _____ to _____

Moratorium Period: _____ to _____

Is consent required from NCA to any ongoing or imminent transactions which would otherwise be prohibited acts? [Please tick the relevant box] Yes No

If yes, please confirm full details in the box below:

Date consent received from NCA: _____



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Date consent given by you to employee: _____

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to NCA, please set out below the reason(s) for non-disclosure:

Please set out any reasonable excuse for non-disclosure

Date consent given by you to employee for any prohibited act transactions to proceed:

Other relevant information:

Signed: _____

Dated: _____

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS



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