

### **Anti-Money Laundering Policy - England**

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Version	2
Policy Contact	Matthew Betteridge
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Target Audience	Agency Workers
Approved by	OneCall24 Policy Team

#### **Policy Statement**

OneCall24 Limited (OneCall24) is committed to operating legally, ethically, and transparently. The company takes full responsibility to ensure that its assets and resources are not used for corruption, irregularities, or money laundering. We are dedicated to detecting and preventing fraud, abuse of position, and any activity that may result in institutional or financial misconduct.

### **Purpose**

This policy ensures that OneCall24's financial processes and procedures comply with current UK antimoney laundering laws, including the Sanctions and Anti-Money Laundering Act 2018, and its 2025 amendments. It also aligns with guidance from the Financial Conduct Authority (FCA) and HM Revenue & Customs (HMRC).

### <u>Scope</u>

This policy applies to all employees, directors, officers, contractors, and third parties acting on behalf of OneCall24 Limited. It is for internal use and must be communicated to all relevant individuals and entities. Non-compliance will result in appropriate disciplinary or legal action.

# **Money Laundering**

Money laundering involves the concealment or disguise of the origins of money obtained through illegal means. This includes, but is not limited to:

- Money or assets received in exchange for criminal or unlawful acts.
- Property gained through criminal activity where the origin, location, or ownership is obscured.
- Assets used to promote or support unlawful activity.
- Financing of terrorism, regardless of the source of funds.

Under this policy, money earned by using the above means is considered money laundering, and it is prohibited;

#### **Compliance**

The company will establish a body responsible for the implementation of this policy.

The company will carry out the procedure to identify any irregularity on behalf of any stakeholder under this policy. The company should;

- a. Identify all the financers of the company and verify their identity
- b. Take special care where stakeholders want anonymity
- c. Maintain proper records of the stakeholders

If anyone in the company knows or suspects that a person is involved in money laundering or terror financing, it is their responsibility to report such person to the body established by the company. In such a case, the company must

- a. Take the details of the people involved
- b. Verify the type of transactions
- c. Reason for suspicion
- d. The amount involved

In accordance with the Sanctions (EU Exit) (Miscellaneous Amendments) Regulations 2025, the company will:

- Screen all clients and third parties against updated sanctions lists.
- Follow urgent and standard designation procedures as required.
- Suspend or terminate relationships with sanctioned individuals or entities.

All relevant staff will receive mandatory AML training upon joining and at regular intervals thereafter. Training will cover:

- Legal obligations under UK AML laws.
- How to identify and report suspicious activity.
- Updates on sanctions and high-risk jurisdictions.

# **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.