

## Anti-Money Laundering Policy - England

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<b>Version</b>	3
<b>Policy Contact</b>	Matthew Betteridge
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<b>Reviewed</b>	06 <sup>th</sup> May 2026
<b>Next Review Date</b>	06 <sup>th</sup> May 2027
<b>Target Audience</b>	All employees, directors, officers, agency workers, contractors and relevant third parties
<b>Approved by</b>	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, in accordance with UK anti-money laundering and counter-terrorist financing legislation and a risk-based approach. OneCall24 recognises that, due to the nature of its operations, the overall risk of money laundering is low. However, proportionate and effective controls are maintained to ensure compliance with UK legislation.

### Purpose

This policy ensures that OneCall24's financial processes and procedures comply with current UK anti-money laundering laws, including the Sanctions and Anti-Money Laundering Act 2018, and its 2025 amendments. This policy also supports compliance with the Money Laundering Regulations 2017 (as amended), the Proceeds of Crime Act 2002, and the Terrorism Act 2000. It also aligns with guidance from the Financial Conduct Authority (FCA) and HM Revenue & Customs (HMRC).

### Scope

This policy applies to all employees, directors, officers, contractors, and third parties acting on behalf of OneCall24 Limited. This includes agency workers, suppliers, introducers, and anyone involved in financial or payment-related activities.

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.

### Business Risk Profile

OneCall24 has assessed its exposure to money laundering and terrorist financing risk as LOW, based on the following:

- The company does not handle client funds beyond standard invoicing and payment processing via its credit control function.
- All payments are conducted through regulated banking systems.
- No cash transactions are accepted.
- Clients are primarily NHS bodies, care homes, and established organisations that are known and vetted.
- Operations are primarily UK-based, with limited overseas activity (e.g. South Africa and Manila) operating through formal banking arrangements.
- No complex financial products or anonymous transactions are offered.

### **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.

Money laundering may occur through placement, layering, or integration of criminal property into the legitimate economy.

### **Governance and Responsibility**

A Nominated Officer / Money Laundering Reporting Officer (MLRO) has been appointed:

- Matthew Betteridge (CEO)  
Email: [directors@onecall24.co.uk](mailto:directors@onecall24.co.uk)

Responsibilities include:

- Oversight of AML controls and risk assessment
- Receiving and evaluating internal suspicion reports
- Submitting Suspicious Activity Reports (SARs) to the National Crime Agency (NCA)
- Acting as the main point of contact with regulators and law enforcement

Responsibility for AML compliance sits with the MLRO, with oversight from senior management.

### **Risk-Based Approach and Due Diligence**

OneCall24 recognises the principles of a risk-based approach to the prevention of money laundering and terrorist financing, in line with relevant UK legislation.

Given the nature of its activities, OneCall24 applies proportionate and pragmatic measures designed to reduce the risk of money laundering and terrorist financing where relevant.

Where appropriate, consideration may be given to factors such as:

- the nature of services provided
- geographic exposure
- delivery and payment methods

Given the low-risk nature of the business, enhanced due diligence measures are only applied where specific risk indicators arise.

### **Customer Due Diligence**

Basic due diligence measures include:

- Verifying client identity via company registration (e.g. Companies House)
- Confirming business legitimacy and contact details

Enhanced scrutiny may be applied where:

- Unusual payment requests are made
- Third-party payments are requested

- Transactions appear inconsistent with normal business activity
- Sanctions concerns are identified

### **Suspicious Activity Reporting**

Any person who knows or suspects that money laundering or terrorist financing is taking place must report this immediately to the MLRO.

The MLRO will assess the information and, where appropriate, submit a Suspicious Activity Report (SAR) to the National Crime Agency (NCA).

Staff must not inform the person concerned or any third party that a SAR has been made, as this may constitute the criminal offence of “tipping off”.

### **Compliance**

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

- a. Maintain appropriate awareness of key business relationships and funding sources where relevant
- 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 internally to the MLRO. 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

### **Sanctions Compliance**

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

- Screen relevant parties where appropriate
- Avoid engaging with sanctioned individuals or entities

### **Record Keeping**

Records relating to AML checks, due diligence, and internal reports will be retained for a minimum of 5 years.

### **Training**

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.

### **Risk Assessment Review**

OneCall24 maintains a documented AML risk assessment reflecting its low-risk business model. This assessment is reviewed periodically (at least annually) by the MLRO or senior management and updated where necessary.

**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.