

# Business Risk Assessment

## Anti Money Laundering (AML)

Moore Allen & Innocent is a multi-disciplined professional services firm providing advice and transactional services in respect of property and chattel. In line with the Anti-Money Laundering Regulations, the firm undertakes Customer Due Diligence (CDD) on all new business relationships. In addition, the firm undertakes the following Regulated Activities for which this specific Risk Assessment applies:

- Estate Agency
- Rural Property Sales
- Commercial Property Sales and Letting
- Art Market Participants (Auction of Furniture and Fine Art)

*NOTE: Currently the Lettings Department is not registered under the Anti Money Laundering Regulations as it does not operate over the identified threshold of €10,000 rental income monthly.*

We predominantly operate within the counties of Gloucestershire, Wiltshire and Oxfordshire and restrict our direct marketing within our immediate postcode areas.

### **Estate Agency / Rural Property / Commercial Property**

Typical property values for the firm range between £200,000 to £2,000,000 within the estate agency department.

Typical property values for the firm range between £500,000 and £25,000,000 within the rural property department.

Typical property values for the firm range between £150,000 and £1,000,000 (sales) and £400 and £2000 (rental per month) within the Commercial Department.

The majority of our clients are owner occupiers who we meet personally; however, we do act for clients who are either landlords or owners who do not live in the property we have been instructed to sell and on occasions for clients who do not live locally or may live overseas.

Looking at our current list of sales and buyers the following management information is available (2021/2022):

Sellers who live in the property being sold - 59%  
Sellers who are landlords selling an investment property - 23%  
Sellers who live in the UK but not at the address of the property being sold - 9%  
Sellers who live overseas - 5%  
Sellers who are defined as 'non private' - 3%  
Sellers with complex ownership structures - 1%

Buyers who are buying as property as a main residence or second home - 74%  
Buyers who are buying the property as a buy to let or other investment - 21%  
Buyers who are defined as 'non private' - 4%  
Buyers with complex ownership structures - 1%

Commercial Landlords living in the UK - 100%  
Commercial Landlords living outside of the UK - 0%  
Commercial Landlords with Complex ownership structures - 2%  
Commercial Landlords who are 'companies or trusts' - 5%

We will not establish any business relationship where we know the client/company are on the UK financial sanctions list.

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### Art Market

We will not accept any cash payments over the company limit of £8,000 and will not accept any payments other than for services which we provide – the preferred payment method is by bank transfer but we will also accept debit/credit card payments to a limit of £1,000 over the telephone or in person as well as cheques (these must clear before goods are released).

Typical art values can range between £50 and £100,000, and research is undertaken for all items to provide an informed estimate for auction. However, it must be recognised that there may be items which sell far in excess of estimate, in all cases of sales exceeding £8,000 (either individual or linked transactions) enhanced CDD is undertaken.

For online and remote sales after receiving the identity documents they must be verified by a video call to verify that the documents you have received are genuine and match the individual identified.

Unusual Delivery - If a customer asks for a purchase to be delivered in an unusual manner or to an address that is not their own or cannot be verified, there may be a genuine reason for this. It is a requirement that CDD is completed by asking questions to decide if the transaction should go ahead and/or a suspicious activity report (SAR) be raised.

We have processes in place to ensure that our teams understand their obligations, follow the processes as stated in our policy and remain diligent and vigilant to identify any signs of potential money laundering activity.

Based on this assessment our view is that our business operates at medium risk of exposure to money laundering activities by the majority of customers who use us. This does not mean that the business is complacent to either low or high-risk transactions and we will continue to monitor them as they arise and take action as required.