

Anti-Money Laundering Policy – Woodville Consultants Limited

1. Introduction

Woodville Consultants Limited is a UK registered company registered number 08093201 registered office situated at 5 Gelliwasted Road, Pontypridd, RCT, CF37 2BP, providing loans to UK based law firms for litigation funding. The business of the Company is low risk in relation to money laundering, however in order to prevent any of our services being used (or potentially used) for any money laundering activity, as well as any of our staff being exposed to money laundering, we wish to put in place the following anti-money laundering policy.

2. Scope of the Policy

The broad definition of money laundering means that potentially anyone could commit a money laundering offence, this includes all employees of the Company, all temporary staff and contractors.

Our policy is to enable the Company to meet its legal and regulatory requirements in a way which is proportionate to the low risk nature of the business, by taking reasonable steps to minimise the likelihood of money laundering occurring.

All employees must be familiar with their legal responsibilities and failure to meet this regime may result in disciplinary action against that employee.

3. What is Money Laundering?

The Proceeds of Crime Act 2002 (POCA) consolidated, updated and reformed criminal law with regard to money laundering.

The UK anti-money laundering regime requirements are set out in the Proceeds of Crime Act 2002 (POCA) (as amended by the Serious Organised Crime and Police Act 2005 (SOCPA)), the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017) and the Terrorism Act 2000

Money laundering can be defined as the process to move illegally acquired cash through financial systems so that it appears to be from a legitimate source. Money laundering offences include: concealing, disguising, converting, transferring criminal property or removing it from the UK (Section 327 POCA); entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (Section 328 POCA); and acquiring, using or possessing criminal property (Section 329 POCA).

There are also several secondary offences, failure to disclose knowledge or suspicion of money laundering to the Money Laundering Reporting Officer (MLRO); failure by the MLRO to disclose knowledge or suspicion of money laundering to the National Crime Agency; and 'tipping off' whereby somebody informs a person or persons who are, or who are suspected of being involved in money laundering, in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.

Any member of staff could potentially be caught by the money laundering provisions, if they suspect money laundering and either become involved with it in some way, and/or do nothing about it. This Policy sets out how any concerns should be raised.

4. **Money Laundering Reporting Officer (MLRO)**

The Company will appoint an MLRO to receive disclosures about money laundering activity and be responsible for anti-money laundering activity within the Company. The officer nominated to do this is Ann Marie Bell.

The MLRO will ensure that appropriate training and awareness is provided to new and existing employees and that this is reviewed and updated as required.

The MLRO will ensure that appropriate anti-money laundering systems and processes are incorporated by the Company.

5. **Suspicious of Money Laundering**

All employees must immediately report any suspicious activity to the MLRO in the prescribed form as set out in this policy document.

Once the matter has been reported to the MLRO, the employee must follow the directions given to the employee and must NOT make any further enquiry into the matter.

The employee must NOT voice any suspicions to the person(s) whom they suspect of money laundering, as this may result in the commission of the offence of “tipping off”. They must NOT discuss the matter with others or note on the file that a report has been made to the MLRO in case this results in the suspect becoming aware of the situation.

6. **Consideration of the Disclosure by the MLRO**

Once the MLRO has received the report, it must be evaluated in a prompt manner in order to determine whether:

- There is actual or suspected money laundering taking place; or
- There are reasonable grounds to know or suspect that this is the case; and
- Whether the MLRO needs to lodge a Suspicious Activity Report (SAR) with the National Crime Agency (the NCA).

Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then consent will be given for any on-going or imminent transaction(s) to proceed.

Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has given specific consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.

All disclosure reports referred to the MLRO and reports made to the NCA will be retained by the MLRO in a confidential file kept for that purpose, for a minimum of 6 years.

The MLRO must also consider whether additional notifications and reports to other relevant enforcement agencies should be made.

7. **Customer Identification and Due Diligence**

- Ensure a check of every client, including repeat clients against the latest, most up to date UK Sanctions List
- Check that the account details on the application against the Proof of Funds statement to ensure they match.
- Check the statement to see the account is active and the sum of the investment is available within the account.
- Source of Funds checks. Check the funds in the account to see if the investment amount has been available within the account for some time. If the statement shows the funds arriving into the account from a separate account, ask for a statement from the sender account (if it is from a sale of property, cashing in of another investment, etc. Check that the ID Documentation provided matches the addresses on the bank statement or whichever Proof of Address document has been provided).
- Ensure that ID Documentation is valid
- Validate client information against the latest and most up to date UK sanctions List

Company Due Diligence;

In addition to the above individuals personal AML checks to be conducted on the directors and shareholders of the Company

- Check that ID Documentation provided matches the addresses on the bank statement or whichever Proof of Address document has been provided.
- Ensure that ID Documentation is valid.
- Validate client information against the latest and most up to date UK sanctions List.
- Check against the UK equivalent Companies House records where possible.

Please see below ID required.

Anti Money Laundering Acceptable Documents:
Each person / Director of Ltd Company must provide one document from List A and one from List B

LIST A: ID

- Current Full Signed Passport Not Expired
- Current Full UK Paper Driving Licence Not Expired
- Current Full UK Photo Card Driving Licence Not expired
- Current Provisional UK Photo Card Driving Licence Not expired
- Current Firearms Certificate Not expired
- Building Industry Sub Contractors Certificate C1S4 or C1S6 Registration card issued by the Inland Revenue Not expired
- Current Blue Disabled Driver's Pass Not expired
- Current Inland Revenue Tax Notification Last Tax Year
- Current Residence Permit (Issued by the Home Office to EU Nationals) Not expired
- Current Benefits Agency Benefit Book or Letter confirming entitlement to benefits (From Dept of Work and Pensions, Job Centre Plus or The Pensions Service) Less than 12 months old
- Current EU Member State Identity Card Not expired
- * National ID Card
- * Residency ID Card

LIST B: Address:

- Current Full UK Paper Driving Licence Not Expired (unless used from LIST A)
- Current Full UK Photo Card Driving Licence Not expired (unless used from LIST A)
- Current Provisional UK Photo Card Driving Licence Not expired
- Bank/Building Society/Credit Union Bank Statements not including Credit Card statements
- Current Bank/Building Society/Credit Union Passbook (Address must be shown in the book) Not expired or closed
- Current Council Tax Bill
- Mortgage Statement (From a recognised lender) Less than 12 months old
- Utility Bill (Includes landline telephone bills but excludes all Mobile Phone Bills) Less than 3 months old
- Current EU Member State Identity Card Not expired
- Voters Roll Check via Experian report.
- Solicitor's Letter confirming recent house purchase. (Previous address must also be verified) Not applicable
- * Certified Letter from Employer
- * Visitation letter from introducer – Certified
- * Tenancy agreement (if the terms of occupancy is in date)

Please note:

The same document cannot be used to verify a customer's name & address.

For Company applications please also provide

- Certificate of Incorporation
- Memorandum / articles of association (if Certificate of Incorporation does not have an address on it)
- Recent utility bill / bank statement showing trading address
- Authorised signature list

For every new or existing investment complete the below checklist, ensuring all applicants have been checked in relation to their ID, verifications and necessary Sanction Checks.



PART 1 | INVESTOR INFORMATION

Single/Joint Investor Information

Title (Ms, Mr, Mrs, Miss, Dr):

Date of Birth:

Surname:

First Names:

Address:

City:

Postcode:

PART 2 | INVESTMENT INFORMATION

Investment Start Date

Littsy / Investment Ref:

Document Name	Received Date	Status	Notes
Application Documents			
Proof of Address			
Proof of Identity			
Proof of Funds			
AML Documents			
Sanction List Checked	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Sanction Document Date:
Sanction List Checked Date			Checked By

PART 3 | DOCUMENT HISTORY

Date

Note

User

Due diligence to be performed where applicable on all customers and partners, who must provide basic information including name of business, owners of business, address, registration details where applicable for corporate bodies.

With instructions from new customers and partners, such, in high risk jurisdictions, transactions that are unusual for the customer or other unusual requests, highly complex transactions or payment arrangements, the Company may wish to seek additional evidence of identity. This may include:

- Checking the organisations website to confirm the identity of personnel, its business address and any other details
- Attending the customer at their business address, if practical or via zoom.
- Evidence of the personal identity of the key contact officer (passport, photo ID, driving licence)
- Checking Government web site to verify company details and officers

If satisfactory evidence of identity is not obtained at the outset then the business relationship or one of transaction(s) cannot proceed any further.

8. Record Keeping

Where “relevant business” is carried out the customer identification evidence and details of the relevant transaction(s) for that customer must be retained for at least 6 years.

All data is kept on our purpose built Littsy system, which is a cloud based system, backed up daily through automated FTP transfers for the database & data.

The source code is remotely backed up and stored through a github repository in case of source code.

All documentation is stored within a secure shared cloud hosted drive (hosted by Google) and is regularly backed up to Google’s own servers.

All data is kept on our purpose built Littsy system. Littsy is an investment management system that is cloud hosted on a managed VPS network. The Littsy system has a daily scheduled back up of all data that is transferred to a secure remote server via SFTP. The database is also remotely downloaded at the end of each day and is backed up to our organisational Google Drive system to ensure there are multiple copies of all source files & data in the event of any downtime or corruption.

All source code for the Littsy system is stored remotely via a private GitHub repository and is backed up to a cloud based storage system as a failsafe for any malicious or damaged files.

CONFIDENTIAL – template report to be made to MLRO

Report to the Money Laundering Reporting Officer

Report of Money Laundering Activity

To: **Money Laundering Reporting Officer**

From: _____

[Insert name of employee]

Title: _____

[Insert Title]

Tel No: _____

URGENT YES/NO

Date by which response needed: _____

Details of suspected offence:

Name(s) and address(s) of person(s) involved:

[If a company, please include details of nature of business]

Nature, value and timing of activity involved:

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

Nature of suspicions regarding such activity

[Please continue on a separate sheet if necessary]

Has any investigation been undertaken (as far as you are aware)?

Yes / No

If yes, please include details below:

[Delete as appropriate]

Have you discussed your suspicions with anyone else?

If yes, please specify below, explaining why such discussion was necessary:

YES/NO [Delete as appropriate]

Please set out below any other information you feel is relevant:

Signed: _____ **Dated:** _____

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 5 years’ imprisonment.

THE FOLLOWING PART OF THIS FORM TO BE COMPLETED BY THE MLRO

Date report received: _____

Date receipt of from 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 the NCA?

Yes/No [Delete as appropriate]

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

Details of liaison with the NCA regarding the report:

Notice Period: from: to:

Moratorium Period: from: to:

Is consent required from the NCA to any ongoing or imminent transactions, which would otherwise be prohibited acts?

Yes/No

[Delete as appropriate]

If yes, please confirm full details below

Date consent received from the NCA:

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 the 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 SIX YEARS

The above document was given to to familiarise him/herself with its contents and the actions required by her and the company should the need arise.

He/She has understood and been tested on the contents of the company's anti money laundering policy document and shows a thorough understanding of her responsibilities with regard to that document.

Signed..... Director

Signed - Employee

Date