Anti-Money Laundering (AML) Compliance Policy

AJ.Fowler Properties Ltd
Company Registration Number: NI726202
Registered Office: 42 Low Road, Lisburn, BT27 4TJ
Effective Date: 02/05/2025

1. Policy Statement

AJ.Fowler Properties Ltd is committed to preventing money laundering, terrorist financing, and financial crime in accordance with applicable UK legislation.

2. Customer Due Diligence (CDD)

The Company conducts identity verification prior to introducing property transactions.
This includes:
• Government-issued photo ID
• Proof of address (within 3 months)
• Proof of funds / source of funds evidence
• Enhanced due diligence where risk factors are identified.

3. Systems Used

Compliance and record keeping may be managed using:
• Podio – Secure CRM storage
• Make – Automation controls
• PandaDoc – Secure contract records
• Stripe – Payment verification
• Outlook – Communication records
• Twilio – WhatsApp communication logs
• SharePoint – Secure document storage and records management.

4. Risk Assessment

The Company assesses risk based on client profile, transaction size, source of funds, and jurisdiction. Higher risk cases may require enhanced due diligence.

5. Record Keeping

AML documentation will be retained for a minimum of 5 years in accordance with UK regulatory requirements.

6. Reporting Suspicious Activity

If suspicious activity is identified, the Company reserves the right to refuse service and report concerns to relevant authorities where required.

7. Training & Responsibility

The Director is responsible for ensuring AML procedures are followed and periodically reviewed.

8. Money Laundering Reporting Officer (MLRO)

The Director of AJ.Fowler Properties Ltd acts as the Money Laundering Reporting Officer (MLRO) and is responsible for submitting Suspicious Activity Reports (SARs) to the National Crime Agency where required.