



ANTI-MONEY LAUNDERING (AML) POLICY

1. Purpose

STK Property Management Ltd is committed to preventing money laundering and terrorist financing in line with the Proceeds of Crime Act 2002, Money Laundering Regulations 2017, and related UK legislation.

This policy sets out how we identify, assess, and manage money-laundering risks within our property management activities.

2. Scope

This policy applies to:

- Directors, employees, contractors, and agents
- All business activities involving landlords, tenants, councils, and third-party partners

3. Risk Assessment

We recognise that property transactions can be used for money laundering. Our risk exposure is assessed based on:

- Nature of the client (private landlord, company, local authority)
- Transaction size and complexity
- Source of funds
- Geographic risk

Council placements and local authority contracts are generally considered low risk, but checks are still applied where required.

4. Customer Due Diligence (CDD)

We carry out proportionate due diligence before entering into business relationships.

For landlords:

- Proof of identity (passport or driving licence)
- Proof of address
- Proof of property ownership (Land Registry or equivalent)
- Company documents where applicable

For corporate clients:

- Certificate of incorporation
- Registered address
- Director/shareholder identification

5. Enhanced Due Diligence (EDD)

Enhanced checks may be applied where:

- Transactions appear unusual or complex
- The source of funds is unclear
- Politically Exposed Persons (PEPs) are involved

6. Monitoring & Record Keeping

- Records are retained for a minimum of 5 years
- Transactions are monitored for unusual activity
- Any suspicious activity is escalated internally

7. Reporting Suspicious Activity

If money laundering or terrorist financing is suspected:

- A Suspicious Activity Report (SAR) will be submitted to the National Crime Agency (NCA) without delay
- No disclosure will be made to the client (tipping-off is prohibited)

8. Training

Staff involved in lettings or property management receive appropriate AML awareness training.

9. Review

This policy is reviewed annually or when legislation changes.

Last reviewed: January 2026