Anti-Money Laundering Policy

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Resident Input	n/a
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1. What this policy is for

1.1 As a Registered Provider of Social Housing and a charitable registered society, Southway Wythenshawe Homes is committed to preventing money laundering and achieving the highest standards of good governance across all its activities, both for Southway Wythenshawe Homes and its subsidiaries (together the "Group"). This Policy outlines Southway Wythenshawe Homes's approach in relation to incidences where money laundering may be detected, suspected or where attempts are identified.

1.2 In recent years, legislation and regulation has shifted the responsibility for detecting and preventing money laundering from government agencies onto organisations and their employees, exposing individuals to potentially severe penalties if they are convicted of these offences. Southway Wythenshawe Homes is legally obligated to report any knowledge or suspicion of money laundering to the National Crime Agency ("NCA").

1.3 Southway Wythenshawe Homes is committed to reducing money laundering and will seek the appropriate civil, criminal and where necessary disciplinary sanctions against those who seek to commit offences against or involving the organisation. Southway Wythenshawe Homes is committed to the highest ethical standards and operates a zero tolerance policy towards money laundering. It expects all its employees to operate in such a way that the reputation of the Group is not called in question.

1.4 In accordance with the recommendations of the National Housing Federation, we continue to assess the money laundering and terrorist financing risks the Group faces, to ensure that we implement internal controls to prevent our services being misused for money laundering, and to implement internal and external reporting channels for suspected money laundering instances. We will continue to provide appropriate training for all colleagues.

1.5 All employees are expected to follow appropriate policies and procedures and apply controls which minimize the risk and the opportunity for money laundering to occur.

1.6 This Policy should be read in conjunction with the Group's Code of Conduct for Staff and the Code of Conduct for Board Members.

Aims and Objectives

1.7 The aim of this Policy is to provide guidance in relation to the definitions of money laundering and Southway Wythenshawe Homes's response when cases are suspected. This Policy compliments Southway Wythenshawe Homes's financial policies which set out the key system controls, the Group's Code of Conduct to ensure maximum protection against the financial risks or reputational risk where concerns are raised, and the Group's Whistleblowing Policy providing further guidance.

1.8 Key objectives are as follows:

- To set out the Policy of Southway Wythenshawe Homes in relation to money laundering matters.
- To ensure compliance with money laundering laws, rules and regulations.
- To enable employees, Board Members and persons otherwise associated with the Group to understand the risks associated with money laundering, to be able to recognise, prevent, and to report any wrongdoing.
- To provide suitable communication channels so that any information reported is properly and effectively dealt with.
- To create and maintain a rigorous and effective framework for dealing with suspected instances of money laundering.
- To ensure firm action against individuals involved in money laundering.

2. Who This Policy Applies to

2.1 This Policy applies to all employees, permanent and temporary, trainees, apprentices, volunteers including involved tenants, contractors, consultants,

suppliers, business partners, board members of Southway Wythenshawe Homes and directors of any subsidiaries within the group (collectively referred to as Board Members for the purposes of this Policy), and those acting on behalf of Southway Wythenshawe Homes in any business transactions (including agents), otherwise termed as 'associated persons'.

3. Regulation and Legal Requirements

3.1 This policy supports compliance with the following regulations and legal requirements

- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) (MLR 2017)
- Proceeds of Crime Act 2002 (POCA)
- Terrorism Act 2000

3.2 The penalties for committing anti-money laundering offences include:

- Disciplinary Policy & Procedure – actions and decisions regarding employees where evidence of money laundering is found, will be in accordance with the Group's Disciplinary process.
- Proceeds of Crime Act 2002 ("POCA"). Individuals found guilty of money laundering offences face up to 14 years imprisonment and / or unlimited fines.
- Terrorism Act 2000. Individuals found guilty of money laundering offences face up to 14 years imprisonment and / or unlimited fines.
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended). Individuals who fail to comply with these regulations may be subject to civil penalties or face criminal prosecution, which can lead to unlimited fines and/or imprisonment for up to two years.

4. What Is Money Laundering

4.1 The objectives of this Policy in relation to anti money laundering take into account the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) (the "MLR 2017") and ensure Southway Wythenshawe Homes has adequate internal controls to counter money laundering activities.

4.2 Money laundering can be defined as exchanging assets or money that have been derived from criminal activity for assets or money that are 'clean'. Money laundering also includes money or assets that are likely to be related to terrorist activities, however they have been obtained.

4.3 Money laundering offences under POCA involve knowing, or suspecting, that a specific item of property is a person's benefit from criminal conduct, when it is in fact that person's benefit from criminal conduct, and:

- Concealing, disguising, converting, transferring or removing it from England & Wales, Scotland or Northern Ireland (section 327)
- Entering into or being concerned in an arrangement which a person knows or suspects facilitates the acquisition, retention, use or control of it by or on behalf of another person (section 328), or
- Acquiring, using or possessing it (section 329).

4.4 Additional money laundering offences under the Terrorism Act section 18 involve entering into or being concerned in an arrangement which facilitates the retention or control, by concealment, removal from England & Wales, Scotland or Northern Ireland or transfer to others, of property which is:

- likely to be used for the purposes of terrorism;
- proceeds of the commission of acts of terrorism; or
- proceeds of acts carried out for the purposes of terrorism.

4.5 These offences do not apply where the NCA has provided the appropriate money laundering defence. However, money laundering is not only a criminal matter. If money is laundered by the Group, even with a money

laundering defence, then the Group exposes itself to a potential civil liability for the losses suffered by a victim of the underlying criminal offence.

5. What We Will Do

5.1 The Company Secretary is the Group's nominated person (Money Laundering Reporting Officer – MLRO) for receiving internal activity reports relating to money laundering, and assessing whether to report to the NCA (the "MLRO"). For the avoidance of doubt, the Group do not have a nominated officer under sections 330 or 337 of the Proceeds of Crime Act 2002.

5.2 The MLRO will maintain a confidential Anti-Money Laundering Register recording internal reports, decisions, external disclosures, investigations and outcomes.

5.3 Any staff tipping off any person that such a disclosure has been made or tipping off a person who is suspected of being involved in money laundering either directly or indirectly in such a way that is likely to prejudice an investigation ("Tipping Off"). Discussing a matter with the MLRO is not likely to prejudice an investigation. Information relating to money laundering concerns will be shared only on a strict need-to-know basis and records will be maintained securely.

5.4 The MLR 2017 apply to a number of business sectors, including:

- Money Service businesses – financial, credit services etc
- High Value cash dealers
- Trust or Company Service providers, and
- Estate Agents and letting agents.

5.5 The business activities of Southway Wythenshawe Homes do not fit within the business sectors covered by the MLR 2017 and are not legally subject to them. Although there is no legal expectation it remains good practice to formalise and implement relevant controls in areas where business activities

pose a risk in relation to money laundering. This is particularly the case because money laundering in a transaction can open Southway Wythenshawe Homes to significant civil liabilities, even though they are outside the MLR 2017. By way of example, if the Group turn a blind eye to the receipt of stolen money in a property sale, the victim of that theft could then claim against the Group in respect of that stolen money – the Group ends up having transferred away the property and having to pay the sale proceeds to the victims.

5.6 Having conducted a risk assessment, for Southway Wythenshawe Homes the key areas of business risk are:

- Right to Buy (RTB)
- Right to Acquire (RTA)
- Shared Ownership (SO) disposals
- Outright Sale disposals
- Arrears collection.

5.7 The Anti Money Laundering Procedure (the "AML Procedure") only applies to those members of staff who are involved in the above transactions ("Relevant Transactions"), albeit the AML Procedure also assists in the interpretation of this Policy and should therefore be read by all staff in conjunction with this Policy.

5.8 Any member of staff who suspects that money laundering may be taking place involving any part of the organisation must report it immediately to the MLRO and otherwise must not discuss their suspicions with anyone else without the authority of the MLRO.

5.9 It is impossible to be definitive on how to spot money laundering or on how to decide whether to make a report to the MLRO. Criminals are constantly developing new and more sophisticated ways to launder money.

5.10 The AML Procedure details examples of possible warning signs that may indicate that money laundering might be present. It is not a definitive list, and

staff must use their own experience and judgement to consider individual cases.

5.11 Any weaknesses in systems, procedures or controls identified through AML reviews, investigations or audits will be addressed through a documented action plan.

6. Equality, Diversity and Inclusion

6.1 An Equality Impact Assessment (EIA) was completed September 2026. There were no actions from this.

7. Who is responsible

7.1 The people responsible for overseeing this policy are listed below

Role	Responsibility
Board	The Board has overall responsibility for ensuring the Group has the right policies and procedures for anti-money laundering and is in compliance with this Policy. Board Members must complete annual declarations of interest and declare any new actual, potential or perceived conflicts as they arise.
Company Secretary	The Company Secretary is responsible for receiving internal activity reports relating to money laundering and assessing whether to report to the NCA. For the avoidance of doubt, the Group do not have a nominated officer under sections 330 or 337 of the Proceeds of Crime Act 2002.
Managers	Managers must make sure anti-money laundering procedures are followed and stay alert to anything unusual that could indicate money laundering. If they are unsure about anything, they should seek advice from the Company Secretary. Managers should promote a strong anti-money laundering culture within their teams and make sure all employees understand the relevant procedures. They are also responsible for ensuring effective internal controls are in place and working properly, particularly where staff work alone and risks may be harder to spot. Preventing and identifying money

	laundering is primarily a management responsibility, but all employees have a role to play. To help meet these responsibilities, line managers should: • Inform staff of the Group's Code of Conduct as part of their induction process, paying particular attention to the need for accurate completion of personal records and forms. • Ensure that all employees for whom they are accountable are made aware of the requirements of the Policy. • Assess the types of risk involved in the operations for which they are responsible. • Ensure that adequate control measures are put in place to minimise the risks. This must include clear roles and responsibilities, supervisory checks, staff rotation (particularly in key posts), separation of duties wherever possible so that control of a key function is not invested in one individual, and regular reviews and test checks to ensure that control measures continue to operate effectively. • Ensure that controls are being complied with. • Contribute to their director's assessment of the risks and controls within their business area, which feeds into the identification of money laundering risks.
All Employees	Employees must follow the standards set by their professional body (where applicable) and make sure they understand them. All employees must follow this Policy whether they are working in the office, at home, or in any other location. Employees must complete annual declarations of interest and declare any new actual, potential or perceived conflicts as they arise.

Training and Screening

7.2 Training will be provided (and recorded) for relevant employees and Board Members, and reassessed regularly to ensure it remains up to date and appropriate. New employees and Board Members will be made aware of this policy as part of their induction process.

7.3 DBS checks will be carried out for relevant employees and officers, in accordance with the DBS process.

7.4 Southway Wythenshawe Homes will undertake proportionate due diligence on customers, contractors, partners, agents and other third parties where money laundering risks may arise.

8. Monitoring and Reporting

8.1 The Audit & Risk Committee will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. As a minimum they will receive an annual report confirming whether there has been any

8.2 Internal control systems and procedures will be subject to regular audits, to provide assurance they are effective in countering money laundering.

8.3 In addition to the process set out above, this Policy will undergo a formal review at least once every three years, with additional ad-hoc reviews triggered immediately by any changes in applicable legislation, regulation or authoritative guidance that may affect its provisions, or in advance of any change in business areas conducted by Southway Wythenshawe Homes that may bring them within the MLR 2017.

8.4 All employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

8.5 All employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Assistant Director of Compliance & Assurance.

8.6 This Policy does not form part of any employee's contract of employment and it may be amended at any time.

8.7 Southway Wythenshawe Homes will ensure that the Money Laundering Policy is accessible to all Board/Committee Members, employees at all levels and grades, including senior managers, officers, employees, (whether permanent, fixed-term or temporary), consultants, contractors, trainees,

seconded staff, home workers, mobile workers, casual workers and agency staff, volunteers, agents, sponsors, or any other person associated with us.

8.8 The next review date for this policy is shown on the cover sheet.

9. Glossary

Term	Definition
Anti-Money Laundering (AML)	The checks and procedures used to prevent money from crime being made to look legitimate.
Money laundering	Hiding where money or assets gained through crime came from so they appear legitimate.
Money Laundering Reporting Officer (MLRO)	The person responsible for receiving reports of suspected money laundering and deciding whether they need to be reported externally.
National Crime Agency (NCA)	The UK organisation that receives reports about suspected money laundering and other serious crime.
Proceeds of crime	Money or property obtained through criminal activity.
Suspicious activity	Activity or transactions that may indicate money laundering.
Tipping off	Telling someone about a money-laundering report or investigation in a way that could affect the investigation.
Due diligence	Checks carried out on customers, contractors, partners or other third parties to help identify and manage risks.

Internal controls	Checks and processes designed to reduce the risk of money laundering.
Relevant transactions	Transactions identified as having a particular money-laundering risk and which are covered by the AML Procedure.
Money laundering defence	Permission from the NCA in relation to activity that could otherwise result in a money-laundering offence.
Associated persons	People or organisations acting for or connected with Southway Wythenshawe Homes in business activities, such as contractors, suppliers, partners and agents.