Money Anti Laundering Statement

Issue No: 04
Date Issued: JUN16
Approved by: CEO
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Date Reviewed: NOV26
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1. Overview

Money laundering means exchanging money or assets that were obtained criminally for money or other assets that are 'clean'. The clean money or assets don't have an obvious link with any criminal activity. Money laundering also includes money that's used to fund terrorism, however it's obtained. In other words "terrorist financing" means fundraising, possessing or dealing with property or facilitating someone else to do so, when intending, knowing or suspecting or having reasonable cause to suspect that it is intended for the purposes of terrorism.

Money laundering involves the proceeds of crime, while terrorist financing may involve legitimate property or the proceeds of crime.

The Money Laundering Regulations apply to a number of different business sectors, including financial and credit businesses, accountants and estate agents.

MAST is NOT covered by The Money Laundering Regulations, therefore it is not required to put in place certain controls to prevent your business from being used for money laundering

However, money laundering is part of the wide range of risks that MAST Board of Directors and management of MAST undertake to consider, assess and take steps to detect any processes that might lead to MAST being used for money laundering activities.

While the **risk to MAST of breaching legislation is considered to be low**, MAST staff in all areas should be aware that they could be potentially exposed to money laundering acts. It is important that all staff

are aware of their responsibility to report any suspicions of money laundering activity.
The UK Anti Money Laundering Legislation (AMLL) consists of:

- The Proceeds of Crime Act 2002 (POCA)
- The Terrorism Act 2000 (TA)
- Money Laundering Regulations 2007

The Policy should be read alongside MAST Whistleblowing Policy, and MAST Anti-bribery and Corruption Policy.

2. MAST Policy

(a) Aims

MAST aims to:

a) eliminate money laundering practices;
b) demonstrate the commitment to countering laundering practices;
c) make a positive contribution to improving business standards of integrity, transparency and accountability wherever they operate.

(b) On-going monitoring

MAST undertakes the following practices to prevent MAST business from being used for money laundering practices. These include:

- assessing the risk of MAST being used by criminals to launder money,
- monitoring MAST Clients' business activities,
- keeping documents that relate to financial transactions, the identity of MAST Clients and Suppliers,
- making sure that MAST staff are aware of MAST anti money laundering policy.

Once any of MAST staff decides there are reasonable grounds to suspect money laundering they must tell their Line Manager, CEO or HR at the earliest possible opportunity.
When MAST assesses the risks of money laundering that apply to the services provided by MAST, the following is considered:

- the types of Clients/Suppliers MAST has,
- where MAST and our Clients/Suppliers are based

- Clients/Suppliers' behaviour
- how Clients/Suppliers' come to MAST business
- the services MAST offers
- MAST delivery channels and payment processes, for example cash over the counter, cheques, electronic transfers or wire transfers
- where MAST Clients/Suppliers funds come from or go to, if known / possible.

(c) Clients/ Suppliers that might pose a risk

MAST takes into consideration that it might be at risk of money laundering from:

- new Clients/Suppliers carrying out large, one-off transactions
- a Clients/Suppliers who's been introduced to MAST - because the person/entity who introduced them to MAST may not have carried out 'due diligence' thoroughly
- businesses with a complicated ownership structure that could conceal underlying beneficiaries
- a Clients/Suppliers - or group of Clients/Suppliers - who makes regular transactions with the same individual or group of individuals.

(d) Client/Suppliers behaviours that might suggest a risk

Behaviour that may indicate a potential risk could be when Clients/Suppliers:

- doesn't want to give you identification, or gives MAST identification that isn't satisfactory
- doesn't want to reveal the name of a person they represent
- agrees to bear very high or uncommercial penalties or charges
- enters into transactions that don't make commercial sense
- is involved in transactions where MAST can't easily check where funds have come from.

(e) Raising concerns and seeking guidance

MAST will provide secure and accessible channels through which employees and others should feel able to raise concerns and report violations ("whistleblowing") in confidence and without risk of reprisal. These channels will also be available for employees and others to seek advice or suggest improvements.

MAST will be open to receiving communications from relevant interested parties with respect to possible money laundering activities.

(f) Internal controls and audit

MAST will maintain accurate books and records, available for inspection, which properly and fairly documents all financial transactions. The enterprise should not maintain off-the-books accounts.

MAST will subject the internal control systems, in particular the accounting and record keeping practices, to regular audits to provide assurance that they are effective in countering money laundering.

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