# Anti-Money Laundering Policy

| POLICY SCHEDULE | |
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| Policy title | Anti-Money Laundering Policy (AML) |
| Policy owner | Director of Finance |
| Policy lead contact | Assistant Director of Finance - Corporate Services |
| Approving body | Audit Committee |
| Date of approval | July 2020 |
| Version no. | 1 |
| Related Policies, Guidelines and Procedures | Financial Regulations<br>Fraud Response Plan<br>Guide to raising concerns<br>Donations Policy<br>Financial Administration of Gifts and Donations Policy<br>Records Management Policy |
| Review interval | 3 yearly, or on changes to relevant legislation or guidance |
| Further info contact | Assistant Director of Finance - Corporate Services |

## 1. Introduction

The University is committed to the highest standards of ethical conduct and integrity and to preventing and detecting any criminal activity, including money laundering, involved in transactions or activities which involve the University.

This Policy outlines how the University will manage money laundering risks and comply with its legal

**Members of Council** and **co-opted members of Council Committees, Directors and Officers of subsidiary undertakings** are also required to comply with this Policy.

Any individual could be committing an offence under anti-money laundering laws OR POCA if they suspect money laundering activity and/or if they become involved in some way and/or fail to take appropriate steps in relation to it.

### 3.2 Where it applies

This Policy applies to the University's activities in the UK and overseas.

### 3.3 What it applies to

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If the MLRO concludes that money laundering or an offence under POCA

| **CONFIDENTIAL - Suspected Money Laundering Reporting Form**<br>Please complete and send this to the Money Laundering Reporting Officer ("MLRO") using the details below and append any supporting documents | |
|---|---|
| From: | School/Service: |
| Contact Details : | |
| **DETAILS OF SUSPECTED OFFENCE** [Please continue on a separate sheet if necessary] | |
| Name(s) and address(es) of person(s) involved, including relationship with the University: | |
| Nature, value and timing of activity involved: | |
| Nature of suspicions regarding such activity: | |
| Details of any enquiries you may have undertaken to date: | |
| Have you discussed your suspicions with anyone? And if so, on what basis? | |
| Is any aspect of the transaction(s) outstanding and requiring consent to progress? | |
| Any other relevant information that may be useful? | |

This form should be scanned and sent as a pdf file to the MLRO.