Right Homes Enhanced Due Diligence (EDD) Policy and Procedures

Right Homes is committed to preventing money laundering and the financing of criminal activities. This Anti-Money Laundering (AML) Policy outlines the steps, controls, and procedures that our business will undertake to ensure compliance with relevant AML laws and regulations. We are dedicated to maintaining the highest standards of ethical conduct, integrity, and transparency in all our transactions.

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1. Introduction

1.1 Purpose
The purpose of this document is to establish a comprehensive policy and set of procedures for conducting Enhanced Due Diligence (EDD) at Right Homes.

1.2 Scope
This policy applies to all employees and agents involved in customer onboarding, transactions, and ongoing monitoring within Right Homes.

1.3 Regulatory Framework
This policy is designed to comply with all applicable anti-money laundering (AML) and counter-terrorist financing (CTF) regulations.

2. Policy Statement

2.1 Commitment to EDD
Right Homes is committed to conducting business with integrity and in compliance with all relevant AML and CTF regulations. EDD is a critical component of our risk management framework.

2.2 Importance of EDD in MLTF Prevention
Enhanced Due Diligence is implemented to identify and mitigate the risks associated with high-risk customers, transactions, and jurisdictions, ensuring the prevention of money laundering and terrorist financing.

2.3 Legal Compliance
Right Homes will adhere to all local and international laws and regulations related to EDD. Non-compliance will not be tolerated and may result in legal consequences.

3. Risk-Based Approach

3.1 Risk Assessment
A comprehensive risk assessment will be conducted regularly to identify and evaluate MLTF risks associated with our business operations.

3.2 Customer Risk Profiling
Customers will be categorized based on their risk level, considering factors such as the type of transaction, business relationship, and geographic location.

3.3 Transaction Risk Assessment
Transactions will be assessed based on their risk level, considering factors such as transaction size, frequency, and complexity.

3.4 High Risk Third Country
Operating in countries or regions known for weak anti-money laundering controls and high levels of corruption increases the risk of facilitating illicit transactions. Here are the countries currently on the list as ‘high risk third country’ for AML purposes.

- Albania
- Barbados
- Burkina Faso
- Cayman Islands
- Democratic People's Republic of Korea (DPRK)*
- Democratic Republic of the Congo
- Gibraltar
- Haiti
- Iran*
- Jamaica
- Jordan
- Mali*
- Mozambique
- Myanmar*
- Panama
- Philippines
- Senegal
- South Sudan*
- Syria*
- Tanzania
- Turkey
- Uganda
- United Arab Emirates
- Yemen*

Under the UK’s money laundering laws, clients from these countries must be subjected to an enhanced due diligence (EED)

4. Customer Due Diligence (CDD) Procedures

4.1 Standard CDD Procedures
Standard CDD procedures using (KYC) Procedures will be followed for all customers, including the collection and verification of identity and beneficial ownership information via Passports, Driver License and any other Government Issued ID's as part of the CDD procedure. Categorize all clients into low, medium, and high-risk profiles.

4.2 Triggers for EDD
Specific triggers will be defined to prompt the initiation of Enhanced Due Diligence, such as high-risk customer profiles or unusual transaction patterns.

4.3 Determining the Need for EDD
The decision to apply EDD measures will be based on a risk-based approach, considering the triggers identified and the risk assessment results.

4.4 Obtaining Additional Information
When EDD is required, additional information relevant to the risk profile of the customer or transaction will be obtained.

4.5 Verification of Identity
Stringent measures will be applied to verify the identity of customers subject to EDD, including the use of reliable and independent sources.

4.6 Identifying Ultimate Beneficial Owners (UBOs)
For entities and complex ownership structures, efforts will be made to identify and verify the UBOs, and additional scrutiny will be applied.

5. Enhanced Due Diligence (EDD) Procedures

5.1 Enhanced Monitoring of High-Risk Clients
High-risk clients identified through the risk assessment will be subject to enhanced monitoring, including more frequent reviews and additional scrutiny.

5.2 Enhanced Monitoring of High-Value Transactions
Transactions exceeding predetermined high-value thresholds will undergo enhanced monitoring, including additional documentation and verification procedures.

5.3 Politically Exposed Persons (PEPs)
Stringent EDD measures will be applied to transactions involving PEPs, and approval from senior management will be obtained before establishing or continuing a business relationship.

5.4 Transactions in High-Risk Jurisdictions
Transactions involving clients or properties in high-risk jurisdictions will be subject to enhanced scrutiny, with additional verification steps applied.

5.5 Unusual Transaction Patterns
Unusual transaction patterns, such as inconsistent activity or sudden changes in behaviour, will trigger enhanced monitoring and may prompt the filing of a suspicious activity report.

6. Documentation and Record Keeping

6.1 Documenting EDD Decisions
All decisions related to the application of Enhanced Due Diligence will be thoroughly documented, including the rationale for the decision.

6.2 Record Keeping
Complete and accurate records of all customers due diligence, enhanced due diligence, and transaction monitoring activities will be maintained for the prescribed period.

6.3 Data Protection and Privacy
Customer information collected during the EDD process will be handled with the utmost confidentiality and in compliance with data protection and privacy laws.

7. Training and Awareness

7.1 Employee Training Programs
All employees involved in customer due diligence and EDD processes will undergo regular training on the latest AML and CTF regulations, as well as internal policies and procedures.

7.2 Continuous Awareness
Ongoing communication and awareness programs will be implemented to ensure that employees remain vigilant and informed about emerging Laws and updates.

7.3 Reporting Channels for Employees
Employees will be provided with clear channels for reporting concerns or suspicions related to money laundering or terrorist financing. Employees are required to fill in a SAR (suspicious activity report) to hand over to the MLRO officer, who will take further actions.

7.4 Compliance and Oversight
Appoint a compliance officer (Director Shahid Mahmood) responsible for ensuring the implementation of AML policies and procedures. Conduct periodic internal reviews to assess the effectiveness of AML controls and make necessary improvements.

8. Communication with Authorities

8.1 Reporting to Regulatory Bodies
Timely and accurate reports will be submitted to relevant regulatory bodies as required by law.

8.2 Timing and Content of Reports
Reports will be submitted promptly, containing all necessary information and documentation related to suspicious activities to the NCA (National Crime Agency) by the MLRO when required.

8.3 Collaboration with Law Enforcement
Right Homes will cooperate fully with law enforcement agencies, providing support and information as needed for the investigation of suspected MLTF activities.

9. Internal Controls and Monitoring

9.1 Internal Audit Procedures
Internal audit procedures will be in place to regularly review and assess the effectiveness of the EDD program.

9.2 Ongoing Monitoring of EDD Measures
Ongoing monitoring mechanisms will be established to ensure that EDD measures are consistently applied and are effective in mitigating MLTF risks.

9.3 Management Oversight
Senior management will provide oversight and guidance on EDD activities, ensuring that the program aligns with the overall risk management strategy.

10. Penalties for Non-Compliance

10.1 Disciplinary Actions
Non-compliance with EDD policies and procedures may result in disciplinary actions, including but not limited to warnings, suspension, or termination.

10.2 Legal Consequences
Employees found to be involved in or facilitating money laundering or terrorist financing activities may face legal consequences, including criminal prosecution.

11. Review and Update of EDD Policy

11.1 Regular Review
This EDD policy will be subject to regular reviews to ensure that it remains current and effective in addressing emerging MLTF risks.

11.2 Policy Updates
Updates to the EDD policy will be made promptly in response to changes in the regulatory environment, business operations, or the overall risk landscape.

Right Homes is committed to upholding the highest standards of integrity and legal compliance. This AML Policy, along with the outlined controls and procedures, is an essential part of our commitment to preventing money laundering and the illicit financing of criminal activities. All employees are expected to fully adhere to these measures in the course of their duties.

Director/MLRO

Shahid Mahmood

Signature: DocuSigned by: C8D217BAE464468... 12/7/2023