

ANTI-MONEY LAUNDERING POLICY

Policy Statement:

The McSence Group is committed to being compliant with the provisions of the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002 and anti-terrorism laws. To ensure compliance with the law and to ensure we know and fully understand the identity and structures of our clients we have anti-money laundering policies and procedures in place

All Employees: This policy applies to all persons working for or on our behalf of the McSence Group of Companies which includes the subsidiary companies - *McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd* in any capacity including but not limited to:

✚ All employees at all levels, prospective employees, agency workers, seconded workers, temporary workers, contractors/sub-contractors, clients, agents, external consultants, volunteers, members of the public, group's supply chain, third-party representatives and/or business partners who will be referred to in our Group policies as "all employees".

The Workplace: This policy applies to all persons working for or on our behalf of the McSence Group of Companies in any capacity at the workplace(s) as defined below which includes but not limited to:

✚ McSence Premises, Offices, Units, Business Park, Client's Premises, External Meeting Places, Customers' Homes, Gardens, Sheltered Housing, Whilst On-Call, On-Duty, Emergency Cover, Working from Home including On-Line Meetings, Whilst Driving in Company Time, Working Public Areas (café's, trains, coffee shops, buses etc) and will be referred to throughout this policy as "the workplace".

Client and Matter Due Diligence: McSence Group conducts due diligence enquiries on all new clients to establish and verify our clients' identity and the identity of any beneficial owners. We may also undertake such enquiries on anyone instructing us on behalf of, but who may not be our clients. We cannot act if sufficient information is not provided. We generally require seeing original documentation. We also undertake risk assessments for all new matters for existing clients.

On-going Monitoring: McSence Group undertakes on-going monitoring of all existing clients which may require you to provide us with updated proof of identity documentation.

Source of Wealth and Funds: McSence Group is required to know the source of funds involved in the transactions we are undertaking. We will also have to enquire about the source of your wealth. We accept no responsibility for any transactions being delayed while this information is awaited.

Tipping off: McSence Group must report to the National Crime Agency and other relevant authorities any suspicion or knowledge regarding money laundering or the proceeds of crime. We are not permitted to notify you of the fact that such reports have been made.

Confidentiality: Our duties to report to the National Crime Agency may take priority over any duty to keep your information and the detail of your transactions confidential.

Company Intranet – Staff Zone: All the McSence Groups policies, procedures, handbooks are available on-line to all employees on the McSence Group's Staff Zone Intranet via our website [Login | McSence](#)

Compliance: Failure to comply with the provisions of this Policy may result in Disciplinary proceedings.



McSence Group Signatory:

David Maxwell | Chief Executive

McSence Group - *McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd*

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Policy Amendments & Revisions: This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review. Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Senior Management Team (SMT) to see that all relevant employees receive notice and training if necessary.

POLICY