




Global Procurement Group™

ANTI MONEY LAUNDERING POLICY

Document control

Document Type:	Policy	Approved Version:	2
Document Owner:	Scott High (Global People Director)	Approved Date:	12 th April 2023
Classification	Internal	Approved By:	

*This Policy is available in other formats and languages if required, please contact the People Team

Version Control

Effective Date	Version	Changes	Author(s)
October 2019	1	Policy Created	Chris Baty
April 2023	2	Transferred to new template Update to sections 1,2,3,4,5,6,7,8,9,10	Louise Adey

CONTENTS

1. INTRODUCTION	4
2. SCOPE OF POLICY	4
3. WHAT IS MONEY LAUNDERING?	4
4. MONEY LAUNDERING REPORTING OFFICER (MLRO)	5
5. SUSPICIONS OF MONEY LAUNDERING	5
6. CONSIDERATIONS OF THE DISCLOSURE BY THE MLRO	5
7. CUSTOMER IDENTIFICATION AND DUE DILIGENCE	6
8. ONGOING MONITORING	6
9. DATA PROTECTION	7
10. REFERENCES	7

1. INTRODUCTION

Global Procurement Group (GPG) is a UK-registered company, providing services that specialise in delivering energy services and technology globally across a group of companies. GPG is low risk in relation to money laundering, however, to prevent any of our services being used (or potentially used) for any money laundering activity, as well as any of our employees from being exposed to money laundering, we wish to put in place the following anti-money laundering policy which supplements our internal procedures.

Under the Money Laundering Regulations 2017, we are required to put in place appropriate systems and controls to prevent money laundering. This policy contains information and procedures that we have developed to comply with these obligations.

2. SCOPE OF POLICY

The broad definition of money laundering means that potentially anyone could commit a money laundering offence; this includes all employees of GPG, all temporary staff and contractors.

Our policy is to enable GPG to meet its legal and regulatory requirements in a way which is proportionate to the nature of the business, by taking reasonable steps to minimise the likelihood of money laundering occurring.

All employees must be familiar with their legal responsibilities and failure to comply with this Policy may lead to disciplinary action.

For our employees who are based outside of the UK, should there be any conflict between this policy and a local law, or any location-specific Anti-Money Laundering Policy put in place by GPG, the local law or location specific policy shall take precedence over this policy. Should you have any questions on this, please email the Global Head of Legal.

3. WHAT IS MONEY LAUNDERING?

Money laundering can be defined as the process to move illegally acquired cash through financial systems so that it appears to be from a legitimate source. Money laundering offences include: concealing, disguising, converting, transferring criminal property or removing it from the UK (Section 327 POCA); entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (Section 328 POCA); or acquiring, using or possessing criminal property (Section 329 POCA).

There are also several secondary offences; failure to disclose knowledge or suspicion of money laundering to the Money Laundering Reporting Officer (MLRO); failure by the MLRO to disclose knowledge or suspicion of money laundering to the National Crime Agency; and 'tipping off' whereby somebody informs a person or persons who are, or who are suspected of being involved in, money laundering in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.

Any employees could potentially be caught by the money laundering provisions if they suspect money laundering and either become involved with it in some way and/or do nothing about it. This Policy sets out how any concerns should be raised.

4. MONEY LAUNDERING REPORTING OFFICER (MLRO)

GPG will appoint an MLRO to receive disclosures about money laundering activity and be responsible for anti-money laundering activity within GPG. The officer nominated to do this is Kevin Anderson, Global Head of Legal (kevin.anderson@ngpltd.co.uk).

The MLRO will ensure that appropriate internal procedures are in place for new and existing employees, temporary staff and contractors and that the internal procedures are reviewed and updated as required.

The MLRO will ensure that appropriate anti-money laundering systems and processes are incorporated by GPG.

5. SUSPICIONS OF MONEY LAUNDERING

You must immediately report any knowledge of or suspicion of (or where there are reasonable grounds to suspect) suspicious activity to the MLRO via the following process;

- 1) Send an email to legal.team@ngpltd.co.uk.
- 2) Include in your email;
 - a. Name(s) and address(s) of person(s) involved:
 - b. Nature, value and timing of activity involved:
 - c. Nature of suspicions regarding such activity:
 - d. Has any investigation been undertaken (as far as you are aware)?
 - i. If yes, please include the details below:
 - e. Have you discussed your suspicions with anyone else?
 - i. If yes, please specify below, explaining why such discussion was necessary:
 - f. Any other information you feel is relevant:
 - g. Any relevant evidence available:

Once the matter has been reported to the MLRO, you must follow the directions given by them and **must NOT make any further enquiry** into the matter.

You **must NOT voice any suspicions to the person(s) whom they suspect of money laundering**, as this may result in the commission of the offence of “tipping off”.

You **must NOT discuss the matter with others or note on any files that a report has been made to the MLRO** in case this results in the suspect becoming aware of the situation.

The MLRO will provide wellbeing support to any employees, temporary staff and contractors who raise a report.

6. CONSIDERATIONS OF THE DISCLOSURE BY THE MLRO

Once the MLRO has received the report, it must be evaluated promptly to determine whether:

1. There is actual or suspected money laundering taking place; or
2. There are reasonable grounds to know or suspect that this is the case; and
3. Whether the MLRO needs to lodge a Suspicious Activity Report (SAR) with the National Crime Agency (NCA).

Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then consent will be given for any ongoing or imminent transaction(s) to proceed.

Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has given specific consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.

All disclosure reports referred to the MLRO and reports made to the NCA will be retained by the MLRO in a confidential file kept for that purpose, for a minimum of 5 years after the transaction is completed. For the avoidance of doubt, this will be 5 years after any contract concludes, so could be retained for up to 10 years following the initial suspicion.

The MLRO must also consider whether additional notifications and reports to other relevant enforcement agencies should be made.

7. CUSTOMER IDENTIFICATION AND DUE DILIGENCE

For us to protect ourselves from potential involvement in money laundering, due diligence must be performed on all customers, before establishing a business relationship with them, who must provide basic information including:

- Name
- Address
- Registration details
- Corporate Bodies

When introducing new customers or customers who are known to be from high-risk industries, unusual transactions, and highly complex transactions, you may seek additional evidence of identity. This may include;

- Checking the organisation's website to confirm the identity of personnel, business address and other details
- Searching telephone directory
- Evidence of the personal identity of the key contact officer (passport, photo, driving licence...)
- If satisfactory evidence is not obtained from the outset, the business relationship, or transaction, cannot proceed any further.

You must assess the money laundering risk for each customer and if you suspect enhanced due diligence is required, you should speak to the MLRO before continuing any engagement with the customer. The MLRO will be required to approve the continuance of the business relationship.

If satisfactory evidence of identity is not obtained at the outset then the business relationship or one-off transaction(s) cannot proceed any further. A report should be filed with the MLRO who will then consider if a report needs to be submitted to the NCA.

8. ONGOING MONITORING

You should review customers at regular intervals to ensure that the risk level of each customer information and information held on each customer is not only accurate and up to date but is consistent with the knowledge of the customer and its business. Further due diligence may be required if new people become involved as a customer. Any suspicious activity must be reported to the MLRO.

9. DATA PROTECTION

Customer details must be collected following the Data Protection Act 2018. This data can be "processed" as defined under the Data Protection Act 2018 to prevent money laundering and terrorist financing.

10. REFERENCES

Legislation, regulation, and guidance from external organisations, including:

- The Proceeds of Crime Act 2002 (POCA)
- Terrorism Act 2000
- Fraud Act 2006
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Data Protection Act 2018
- Sanctions and Anti-Money Laundering Act 2018
- Money Laundering and Terrorist Financing (Amendment) Regulations 2019.

Related internal policies and procedures:

- Data Protection (GDPR) Policy and Privacy Notice
- Code of Conduct
- Disciplinary Procedure

Policy last updated: 12th April 2023