



ANTI-MONEY LAUNDERING POLICY

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This policy should be read together with the Firm Wide Risk Assessment, Customer Identity Check and Risk Assessment Form, internal suspicious activity reporting form and the current HMRC anti-money laundering guidance for estate agency businesses.

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Approved by:

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1. Introduction

Proudley Associates Ltd provides valuation and estate agency work, working primarily for insolvency practitioners to value and sell primary chattels but also property assets owned by insolvent corporations and individuals and is registered at HM Revenue and Customs (HMRC) for anti-money laundering supervision.

Proudley Associates Ltd is required under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (the "Money Laundering Regulations" or "MLRs"), as amended from time to time, to put in place appropriate policies, controls and procedures in order to prevent its services being used for money laundering, terrorist financing or proliferation financing, and to manage the risks to which the business and its staff may be exposed.

Proudley Associates Ltd will maintain arrangements enabling suspicious activity to be reported to the National Crime Agency (NCA) through the nominated officer/MLRO where required. The business will not describe itself as "registered with the NCA"; NCA registration is not the basis of the firm's AML supervision.

This policy is intended to reflect the MLRs as amended to July 2026 and current HMRC guidance. It will be updated when legislation, official guidance or the firm's business model changes.

2. What is Money Laundering and Terrorist Financing?

Money laundering is broadly the process by which criminal property is concealed, disguised, converted, transferred, removed from the UK, acquired, used or possessed, or arrangements are entered into concerning criminal property.

In the property sector, money laundering may involve the use of criminal proceeds to purchase or sell property, the use of companies, trusts or intermediaries to obscure beneficial ownership, unusual funding arrangements or transactions designed to disguise the criminal origin of funds.

Terrorist financing is providing or collecting funds, whether from legitimate or illegitimate sources, for the purposes of terrorism.

Proliferation financing is the provision of funds or financial services connected with the manufacture, acquisition, development, transfer, brokering, transport, stockpiling or use of nuclear, chemical or biological weapons, their means of delivery and related materials, including relevant dual-use goods or technology.

Proudley Associates Ltd will assess and manage the risks of money laundering, terrorist financing and proliferation financing ("MLTFPF").

3. Money Laundering and Terrorist Financing Legislation

The principal UK legislation and regulatory framework relevant to Proudley Associates Ltd includes:

- Terrorism Act 2000, including the reporting obligations concerning terrorist financing.
- Proceeds of Crime Act 2002 (POCA), including the principal money laundering offences, internal disclosure obligations and tipping-off/prejudicing an investigation offences.
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended, including amendments made by the Money Laundering and Terrorist Financing (Amendment) Regulations 2026.
- Applicable UK financial sanctions legislation and guidance administered by the Office of Financial Sanctions Implementation (OFSI).
- Data Protection Act 2018 and UK GDPR, together with the specific data-protection provisions applicable to AML compliance.

The business will also have regard to current HMRC guidance for supervised businesses, the HMRC Estate Agent Business Guidance and the HMRC Risk Assessment of Estate Agency Businesses, together with relevant NCA, OFSI, FATF and other official guidance.

3.1 Proceeds of Crime Act 2002

POCA sets out the principal money laundering offences, including:

1. concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327);
2. entering into or becoming concerned in an arrangement which a person knows or suspects facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328); and
3. acquiring, using or possessing criminal property (section 329).

POCA also contains offences relating to failure to disclose knowledge or suspicion of money laundering, tipping off and prejudicing an investigation. Staff must immediately report suspicions internally to the nominated officer/MLRO and must not take any action which could constitute a prohibited act or prejudice an investigation. The nominated officer will determine whether a disclosure to the NCA is required and whether consent is required before a prohibited act is undertaken.

3.2 The Terrorism Act 2000

The Terrorism Act 2000 contains offences concerning terrorist financing and related failure-to-disclose and tipping-off provisions. Staff must report knowledge or suspicion of terrorist financing promptly to the nominated officer/MLRO and must not proceed with a transaction where doing so could constitute an offence.

3.3 Money Laundering Regulations 2017

The MLRs require Proudley Associates Ltd to operate a risk-based AML framework. In particular, the business must:

- carry out and maintain a written firm-wide risk assessment covering money laundering, terrorist financing and proliferation financing;
- maintain appropriate policies, controls and procedures (PCPs) which are proportionate to the size and nature of the business and effectively manage and mitigate identified risks;
- apply customer due diligence (CDD) to customers and beneficial owners as required;
- apply enhanced due diligence (EDD) and enhanced ongoing monitoring where required;
- appoint a nominated officer and, where appropriate, a compliance officer, and ensure HMRC is notified of appointments or changes within the required timescales;
- maintain appropriate systems for identifying, assessing and reporting suspicious activity;
- keep appropriate records for the statutory retention period;

- provide appropriate, up-to-date training to relevant staff; and
- review and update the risk assessment and PCPs when the business, services, customers, delivery channels, risks or relevant legislation/guidance change.

The PCPs must be approved by an appropriate senior manager and must be implemented in practice, not merely maintained as a written document.

4. Scope of the Policy

The broad definition of money laundering means that potentially anyone could commit a money laundering offence, including customers, intermediaries, employees and other persons connected with a transaction.

Whilst many estate agents do not handle customers' money, estate agents may know both parties to a transaction, any intermediaries and how a purchase may be funded. Proudley Associates Ltd therefore has an important role in identifying and reporting suspicious activity.

This policy applies to all employees, contractors and other relevant persons acting for or on behalf of Proudley Associates Ltd. All relevant persons must follow the procedures set out in this policy, the Firm Wide Risk Assessment and associated forms and procedures.

Any breach of this policy will be a serious matter and may result in disciplinary action and, where applicable, personal criminal liability.

5. Money Laundering Reporting Officer (MLRO)

Proudley Associates Ltd appoints Olivia Kay as its nominated officer, also referred to in this policy as the Money Laundering Reporting Officer (MLRO). The business will notify HMRC of the appointment and any subsequent change within the applicable statutory period.

The nominated officer/MLRO will:

1. ensure appropriate AML awareness and training are provided to new and existing employees and relevant contractors, and that training is kept current;
2. keep up to date with applicable legislation and official guidance, including HMRC, NCA and OFSI material;
3. ensure appropriate AML systems, controls and procedures are incorporated into the business and kept under review;
4. ensure the Firm Wide Risk Assessment and PCPs are reviewed and updated when required;
5. ensure appropriate monitoring, testing, internal reviews and audits are carried out, proportionate to the size and nature of the business;
6. receive, assess and document internal disclosures of suspected money laundering, terrorist financing or proliferation financing;
7. determine whether a SAR should be submitted to the NCA and whether a defence against money laundering is required;
8. where required, obtain senior-management approval for establishing or continuing higher-risk relationships;
9. maintain confidential records of internal disclosures and SAR-related material; and
10. consider whether any additional notification to another competent authority is required.

Where a deputy nominated officer is appointed, the appointment and responsibilities will be documented and notified to HMRC as required.

6. Suspicions of Money Laundering

There are a number of factors which may indicate, or which may cause you to suspect that money laundering is taking place. Below is an inexhaustive list of scenarios/points to consider which may indicate suspicious activity:

1. The customer is reluctant to meet face to face;
2. The customer is reluctant to provide details of their identity and source of funds;
3. One party to the transaction is established in a 'high-risk third country';
4. There is no apparent reason why the customer has chosen Proudley Associates Ltd over another organisation that would have been better placed to act;
5. Complex company structures are in place which make it difficult to identify the true owner;
6. One or more individuals involved are in public positions and/or are from locations that carry a higher exposure to the possibility of corruption;
7. Monies have been paid by a third party who does not appear to be connected with the customer;
8. Funds are being sent abroad or to an unusual destination and/or to an unconnected third party;
9. There are late changes to the party in the transaction;
10. Customer asks to hold cash in our account for no apparent reason;
11. The customer requests to pay the full or a large payment in cash or cleared funds up front;
12. The transaction is unnecessarily complex for what the parties are hoping to achieve;
13. Funds are paid in part and/or using foreign currency;
14. Multiple payments are made from different bank accounts;
15. There are unusual sources of funds, for example, use of complex loans, mortgage from an unknown/overseas bank;

All employees and contractors must promptly report to the nominated officer/MLRO any knowledge, suspicion or reasonable grounds for suspicion of money laundering, terrorist financing or proliferation financing. Staff must not investigate the matter beyond what is necessary to perform their ordinary duties unless directed by the nominated officer.

After an internal report, the employee must follow the nominated officer's instructions and must not proceed with any transaction or disclose the suspicion where doing so could constitute tipping off or otherwise prejudice an investigation.

Staff must not record an internal SAR or suspicion on the ordinary customer file. Relevant information must be retained in the confidential AML/SAR record in accordance with this policy.

7. Consideration of the Disclosure by the MLRO

The nominated officer will evaluate an internal report promptly and determine whether:

- there is knowledge or suspicion, or reasonable grounds for knowledge or suspicion, of money laundering, terrorist financing or proliferation financing;
- further information is reasonably required to make the assessment;
- a SAR must be submitted to the NCA;
- a defence against money laundering should be requested where applicable; and
- any other notification to a competent authority is required.

Where the nominated officer concludes that no suspicion remains and there is no other reason preventing the transaction from proceeding, the nominated officer may authorise the relevant activity to continue.

Where a SAR and a request for a defence against money laundering are required, the transaction must not proceed where doing so would constitute a prohibited act unless the necessary defence or other lawful basis applies. Staff must follow the nominated officer's instructions.

Internal disclosures and SAR-related material will be retained confidentially for at least the statutory five-year period, unless a longer period is required by law or considered necessary by the business.

No SAR, internal disclosure or information likely to reveal a suspicion or investigation should be placed on the ordinary customer file.

8. Firm Wide Risk Assessment

Proudley Associates Ltd has assessed the risks of its exposure to money laundering, terrorist financing and proliferation financing.

The Firm Wide Risk Assessment is maintained separately and forms part of this AML framework. The Firm Wide Risk Assessment will identify and assess risks arising from, at minimum:

- the size, nature and frequency of the firm's transactions;
- customers and beneficial owners, including individuals, companies, trusts, estates and intermediaries;
- countries and geographical areas relevant to customers, beneficial owners, properties, funding and transactions;
- the nature of the services provided by Proudley Associates Ltd;
- the way services are delivered and how the business interacts with customers, including remote/non-face-to-face channels;
- ownership and control structures, including opaque or complex structures;
- transaction values and characteristics, including high-value or unusually complex transactions;
- cash, third-party and overseas funding arrangements;
- PEPs and their family members and known close associates;
- sanctions and proliferation-financing risks; and
- any other risks identified through HMRC's sector risk assessment, the National Risk Assessment, relevant law-enforcement priorities and the firm's own experience.

Proudley Associates Ltd will keep the Firm Wide Risk Assessment current and will record material changes. If the business introduces a new service, changes its operating model or delivery channels, or identifies a new material risk, the risk assessment and PCPs will be updated before the new activity is undertaken where practicable. Where a higher risk is identified, the business will apply appropriate EDD and enhanced ongoing monitoring

9. Customer Identity Check and Risk Assessment Form

All relevant employees must assess the MLTFPF risk for each customer and transaction using the Customer Identity Check and Risk Assessment Form at the appropriate point in the relationship and update it when material circumstances change.

The business currently uses SmartSearch for electronic identity verification. The use of SmartSearch does not replace the obligation to apply appropriate risk-based CDD or to investigate inconsistencies and exceptions.

The risk assessment must consider the customer, beneficial owner, transaction, property, geography, funding, delivery channel and any other relevant risk factors. The outcome must determine whether standard CDD, simplified measures where permitted, or EDD and enhanced monitoring are appropriate.

CDD must be completed at the legally required time. For a seller, this will normally be before the property is marketed. For a purchaser, CDD must be completed at the point required for the purchaser relationship and, in an ordinary property sale, before the seller accepts the purchaser's offer.

10. Due Diligence

The identity of all customers must be identified and verified, together with beneficial owners and persons acting on behalf of customers where required. Proudley Associates Ltd must understand the nature and purpose of the business relationship and the customer's circumstances sufficiently to assess and manage MLTFPF risk.

CDD must be proportionate and risk-based. The document lists below are examples of acceptable evidence and are not intended to create a rigid two-document rule in every case. The extent and nature of verification may vary according to risk, provided the business obtains sufficient reliable evidence to meet its legal obligations and can demonstrate its reasoning.

Where an individual or organisation is not from the UK and documents are in a foreign language, the business may require a reliable translation and, where appropriate, independent certification. The method chosen must be proportionate to the risk.

Relevant parties must be screened against applicable UK financial sanctions and other relevant sanctions/prohibitions. The business must also consider current FATF and UK government information concerning high-risk jurisdictions and proliferation-financing risks.

Where CDD cannot be completed satisfactorily, the business must not establish or continue the relationship or carry out the relevant transaction unless the nominated officer has determined that there is a lawful basis to proceed. A SAR should be considered where appropriate.

10.1 Seller

The identity of a seller must normally be obtained and verified before we market their property.

At the outset, the seller must provide, as appropriate:

- Full name
- Date of birth (for an individual)
- Residential address or registered/business address, as applicable

Identity may be verified using reliable independent source documents or electronic verification. The method and evidence used must be recorded on the customer file.

Examples of identity evidence include:

- Current passport
- Current photo-card driving licence
- National identity card where applicable
- Other reliable government-issued identity document

Examples of address evidence include current council tax, bank/building society statement, mortgage statement, utility bill or other reliable independent evidence. Documents should be sufficiently recent for the risk and circumstances of the customer.

10.2 Purchasers

Purchasers must be identified and verified at the point required under the MLRs. In an ordinary property transaction, the purchaser's CDD must be completed before the seller accepts the purchaser's offer.

The purchaser may provide original documents, reliable electronic verification or appropriately certified copies where permitted by the firm's risk assessment and procedures. The evidence used and the reason for the verification method must be recorded.

Where another regulated agent is acting for the purchaser or seller, Proudley Associates Ltd must identify and verify the agent where required and check that the agent is appropriately supervised. Reliance on another regulated person for CDD may only be used where the legal requirements for reliance are satisfied and the required written arrangements and records are in place.

10.3 Beneficial Owners

CDD must be carried out on beneficial owners as required. A beneficial owner may include a person who ultimately owns or controls a company, trust or other legal arrangement, or a person who ultimately owns or controls a property or acts as principal behind an intermediary.

Where a person acts on behalf of a customer, Proudley Associates Ltd must identify and verify that person and obtain evidence of their authority to act.

For companies and other legal persons, the business must understand the ownership and control structure and identify the individual or individuals who ultimately own or control the customer. The applicable ownership/control threshold and relevant control tests under the MLRs must be applied; the business must not rely solely on a percentage threshold where other forms of control exist.

10.4 Simplified Due Diligence

Where the Regulations permit simplified due diligence and the risk assessment supports it, Proudley Associates Ltd may apply simplified measures. A customer must not be treated as low risk merely because it falls within a category which can qualify for simplified measures. Any relevant risk factors, sanctions issues or other concerns must be considered and recorded.

Examples may include certain regulated financial institutions, listed entities and public authorities, subject to the applicable legal conditions. The evidence supporting the treatment must be retained and reviewed.

10.5 Limited Companies

For a limited company, Proudley Associates Ltd must obtain sufficient information to understand and verify the company and its ownership and control, including, as appropriate:

- name and registered number;
- registered office and principal place of business;
- evidence of incorporation and constitutional documents where appropriate;
- names of directors and relevant management body members;
- details of persons exercising control over management;
- details of shareholders and ownership/control structure; and
- identity evidence for relevant beneficial owners and persons acting on behalf of the company.

The business must look through ownership chains to identify the ultimate beneficial owner(s). Where a holding company has subsidiaries or the structure is complex, the extent of review must be proportionate to the risk and sufficient to establish who ultimately owns or controls the customer.

For customers which are listed on a regulated market, regulated financial institutions or public authorities, the business may apply simplified measures where legally permitted and where its risk assessment supports doing so.

10.6 Overseas or Offshore Companies

For an overseas company, Proudley Associates Ltd must obtain sufficient information to understand its legal existence, ownership and control and the nature of its business. This may include:

- name, registration number, registered office and principal place of business;
- names of directors and members of the management body;

- constitutional or equivalent documents;
- certificate of incumbency or equivalent evidence where applicable;
- details of nominee directors or powers of attorney where applicable; and
- identity evidence for the relevant beneficial owners and persons exercising ultimate control

The level of evidence required will be determined by risk. Complex, opaque, nominee or secrecy-jurisdiction structures require particular care and may require EDD.

10.7 Trusts

Where a customer acts on behalf of or is a trust, Proudley Associates Ltd must understand the trust structure and identify the relevant parties, including, as applicable:

- Trust deed or equivalent evidence
- Trustees
- Settlor
- Beneficiaries or class of beneficiaries
- Protector or other person exercising relevant control
- The customer and any person acting on behalf of the customer

The identity of relevant parties must be verified in accordance with the MLRs and the risk assessment. The business should also consider whether the trust has relevant UK registration obligations and, where appropriate, obtain evidence of registration or an applicable exemption.

10.8 Estates and Personal Representatives

Where a customer acts as a representative of an estate, Proudley Associates Ltd will normally require:

- Grant of probate where applicable
- Letters of administration where applicable
- Identity evidence for the executor or administrator
- Evidence of authority to act where necessary

The business will identify and verify the customer and any other relevant person in accordance with the MLRs and the risk assessment.

Copies of identification evidence and supporting CDD records will be retained in accordance with the record-keeping requirements. Original documents will be seen where required, unless an alternative reliable verification method is used in accordance with the firm's procedures.

11. Politically Exposed Persons ('PEP')

A PEP is an individual who is or has been entrusted with a prominent public function. The definition also covers relevant family members and known close associates. Proudley Associates Ltd will have risk-management systems to identify whether a customer or beneficial owner is a PEP, family member or known close associate and will apply EDD as required.

The business must not assume that a PEP is involved in wrongdoing. PEP status is a risk factor requiring appropriate enhanced measures.

The starting point under UK law is that domestic UK PEPs, their family members and close associates are inherently lower risk than non-domestic PEPs. A lower level of EDD may therefore be appropriate for a domestic PEP unless other risk factors are present. Non-domestic PEPs must be treated as high risk

Where a PEP relationship is established or continued, senior management approval must be obtained where required, and source of wealth and source of funds must be established and verified as part of EDD. Enhanced ongoing monitoring must be applied.

PEP status must be considered in conjunction with the overall customer and transaction risk. A person who ceased to hold a prominent public function remains subject to appropriate risk-based measures

12. Enhanced Due Diligence

EDD is required where there is a higher risk of money laundering, terrorist financing or proliferation financing, including where required by the MLRs. Risk factors may include, but are not limited to:

- non-face-to-face or remote relationships where the risk has not been otherwise adequately mitigated;
- a customer, beneficial owner or relevant party established in a FATF Call for Action country or other jurisdiction requiring EDD under current UK law;
- an unusual or unexplained transaction;
- super-prime or unusually high-value property;
- highly complex ownership, transaction or payment arrangements;
- private banking or unusual financing arrangements;
- unexplained third-party payments;
- a PEP, family member or known close associate;
- sanctions or proliferation-financing concerns;
- unexplained source of funds or source of wealth;
- adverse media or other reliable information indicating increased risk; or
- any other factor identified by the firm's risk assessment.

Where EDD is required, the nominated officer or other appropriately authorised senior person must determine the measures to be applied. These may include:

- obtaining additional information about the customer and beneficial owner;
- obtaining additional information about the intended nature and purpose of the relationship;
- obtaining and, where required, verifying source of funds and source of wealth;
- obtaining information about the reasons for the transaction;
- increasing the frequency and depth of ongoing monitoring;
- checking reliable independent information about the organisation, personnel, business address and ownership;
- obtaining additional evidence of identity, authority or ownership/control;
- requiring appropriate senior-management approval for establishing or continuing the relationship;
- ensuring payments are made through appropriate accounts and investigating unexplained third-party payments; and
- taking any other proportionate measures required by the risk assessment.

For a customer or beneficial owner established in a FATF Call for Action country, the business will apply the specific EDD and enhanced monitoring measures required by regulation 33, including additional information, evidenced source of funds, reasons for the transaction, senior-management approval and enhanced monitoring.

13. Proliferation Financing

Proudley Associates Ltd recognises the requirement to assess and mitigate proliferation-financing risk as part of its AML framework.

PF risks will be considered in the Firm Wide Risk Assessment and in customer and transaction risk assessments. Particular attention will be given to sanctions, countries, customers, beneficial owners, intermediaries, payment arrangements and transactions which could indicate a connection with proliferation activity.

The business will apply relevant financial sanctions and other legal restrictions and will report suspicions in accordance with this policy.

14. Training

Proudley Associates Ltd will provide appropriate, relevant and up-to-date AML training to all relevant staff and contractors. Training will be proportionate to the individual's role and the risks faced by the business.

Training is compulsory for new relevant staff before, or as soon as reasonably practicable after, they undertake regulated activity, and refresher training will be provided at appropriate intervals and whenever there is a significant change in law, guidance, the firm's procedures or the individual's responsibilities.

Training will cover, as appropriate:

- the firm's MLTFPF risks and Firm Wide Risk Assessment;
- the firm's policies, controls and procedures;
- CDD, risk assessment and EDD;
- PEPs, sanctions and high-risk jurisdictions;
- source of funds and source of wealth;
- proliferation-financing risks;
- recognising suspicious activity and making internal reports;
- SARs, tipping off and prejudicing investigations; and
- data-protection obligations relevant to AML.

Proudley Associates Ltd may use NAEA PropertyMark AML training and appropriate internal training/reviews. The business will maintain an up-to-date record of training provided, attendees, dates and relevant training content.

15. Ongoing Monitoring

Proudley Associates Ltd will continue to monitor business relationships throughout their duration. Monitoring will include, where appropriate:

- reviewing CDD information and replacing expired or inadequate documents;
- reviewing beneficial ownership and control information;
- monitoring transactions and relevant payment arrangements;
- considering source of funds where appropriate;
- checking that activity remains consistent with knowledge of the customer, transaction and risk profile;
- reviewing changes in circumstances which could affect the risk assessment; and
- increasing monitoring where higher risk is identified.

Specific triggers for review include changes in ownership or parties, unusual activity, changes in funding, new intermediaries, changes in relevant jurisdictional risk, doubts about information previously obtained, or any other event which changes the MLTFPF risk.

The Customer Identity Check and Risk Assessment Form must be updated where material changes occur. A record of the review, updated risk rating and reasons for any changes must be retained.

Any suspicious activity must be reported to the nominated officer. Information which would reveal an internal disclosure or SAR must not be placed on the ordinary customer file.

16. Record Keeping

Proudley Associates Ltd will keep records sufficient to demonstrate compliance with the MLRs and this policy.

Records will include, as appropriate:

- CDD and identification evidence;
- beneficial ownership and control information;
- customer and transaction risk assessments;
- EDD and source-of-funds/source-of-wealth evidence;
- records of ongoing monitoring and reviews;
- the Firm Wide Risk Assessment;
- policies, controls and procedures;
- internal audits, testing and compliance reviews;
- training records; and
- internal disclosure and SAR-related records held confidentially.

Customer and transaction records required by the MLRs will generally be retained for five years beginning on the date the business relationship ends or the transaction is completed, as applicable. Records will be retained longer where another legal requirement applies or where the business has a documented lawful reason to do so.

SAR and internal disclosure records will be kept securely and confidentially and must not be accessible to customers or unauthorised staff.

17. Data Protection

Customer and employee information must be processed in accordance with the Data Protection Act 2018, UK GDPR and the specific data-protection requirements applicable to AML compliance.

AML information will be processed where there is an applicable lawful basis under data-protection law and the MLRs. The business will not generally rely on customer consent as the basis for AML processing where another lawful basis applies.

Personal data obtained for AML purposes will be used only for lawful purposes, kept secure, retained for the required period and disclosed only where permitted or required by law.

Staff must follow the firm's data-protection and information-security procedures. Particular care must be taken with internal SARs and information concerning suspicions, investigations and law-enforcement requests.

HMRC Supervision, Registration and Changes

Proudley Associates Ltd will maintain its HMRC registration for the regulated activities it carries out and will keep registration information accurate.

The business will notify HMRC of material changes within the applicable statutory timescales, including changes to beneficial owners, officers and managers (BOOMs), changes to the nominated officer or compliance officer, additional regulated activities, branches or material changes to the business model where notification is required.

Relevant BOOMs must undergo any HMRC approval checks applicable to estate agency businesses before holding the relevant position where required. The business will maintain appropriate records of approvals and notifications.

