

Anti-Money Laundering Policy

1. Introduction

This Anti-Money Laundering (AML) Policy sets out the commitment of **CIDB SOLUTIONS LTD** to comply with all relevant laws and regulations relating to the prevention of money laundering and terrorist financing in the United Kingdom, including the **Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017** as amended.

The purpose of this policy is to:

- Protect the firm and its clients from being used for criminal purposes.
- Ensure compliance with legal and regulatory obligations.
- Provide clear procedures for all staff and directors.

2. Scope

This policy applies to:

- All directors, officers, and employees of CIDB SOLUTIONS LTD.
- All services provided, including Self-Assessment returns, Corporation Tax returns, VAT submissions, PAYE and payroll processing, bookkeeping, and advisory services.
- All clients, regardless of size, risk level, or location.

3. Responsibilities

- **Money Laundering Reporting Officer (MLRO):**
 - The MLRO is responsible for the oversight of AML compliance.
 - For CIDB SOLUTIONS LTD, the MLRO is **Cozma Ioana Cristina**.
- **All staff and directors:**
 - Must comply with this policy, conduct client due diligence (CDD), and escalate suspicious activity to the MLRO.

4. Risk-Based Approach

CIDB SOLUTIONS LTD will adopt a **risk-based approach** to AML compliance, ensuring proportionate controls are applied depending on the risk profile of each client.

Risk assessment will consider:

- **Client risk:** type of client, ownership structure, reputation.
- **Service risk:** nature of services (e.g., tax returns vs. complex advisory).
- **Geographic risk:** whether the client operates in high-risk jurisdictions.
- **Transaction risk:** unusual complexity, large cash transactions, offshore elements.

5. Customer Due Diligence (CDD)

Prior to entering into a business relationship, the firm will perform CDD checks:

- **Individual clients:**
 - Obtain proof of identity (passport, driving licence).
 - Obtain proof of address (utility bill, bank statement, council tax bill, dated within 3 months).
- **Corporate clients:**
 - Verify incorporation details (Companies House).
 - Identify directors and beneficial owners (shareholders holding >25%).
 - Verify identity and address of each director/beneficial owner.
- **Enhanced Due Diligence (EDD):**
 - Applied where there is higher risk (e.g., politically exposed persons, clients in high-risk jurisdictions).

Records of CDD must be maintained for a minimum of **5 years** after the end of the client relationship.

6. Ongoing Monitoring

- Continuously monitor business relationships.
- Review transactions and client activities for unusual or suspicious patterns.
- Update CDD records if circumstances change (e.g., change of ownership).

7. Reporting Suspicious Activity

- Any staff member who suspects money laundering or terrorist financing must immediately report to the MLRO.
- The MLRO will review the information and, if appropriate, submit a **Suspicious Activity Report (SAR)** to the **National Crime Agency (NCA)** via the SAR Online portal.
- No client should be informed (tipping off) once a SAR is submitted.

8. Record Keeping

- All CDD and transaction records must be retained for **at least 5 years**.
- Records must be kept securely, either electronically or in hard copy, and made available to HMRC or regulators upon request.

9. Training

- All directors and staff will receive AML training upon joining and refresher training annually.
- Training will cover legal obligations, recognising suspicious activity, and the firm's internal procedures.

10. Internal Controls and Audit

- The MLRO will conduct annual reviews of the AML framework.
- Deficiencies identified will be addressed immediately.
- Internal audit procedures may be implemented as the firm grows.

11. Breach of Policy

Failure to comply with this policy may result in disciplinary action, dismissal, or referral to regulatory and law enforcement authorities.

12. Approval

This policy has been adopted by the Board of Directors of CIDB SOLUTIONS LTD.

Date: 15/09/2025

Signed: Director/MLRO: Cozma Ioana Cristina _

Cozma Ioana Cristina

Date: 15/09/2025

Signed: Director: Dan Butnarescu

Dan Butnarescu