SPENCER JAMES

Estate Agents — East London, established 2002

ANTI-MONEY LAUNDERING PROCEDURE

Money Laundering Regulations 2017 / Proceeds of Crime Act 2002 — Client Information

Business name	Spencer James Residential Limited
Address	8a Hartlepool Court, London, E16 2RL
Telephone	020 7474 3636
Email	mail@spencer-james.co.uk
HMRC supervision reference	XJML00000102001
Money Laundering Reporting Officer	James Bisset (Director)
Deputy MLRO	Fabienne Bisset
Last updated	September 2026

1. Our Commitment

Spencer James Residential Limited is committed to ensuring that its business cannot be used to facilitate money laundering or terrorist financing. As an estate agent, we are supervised by HMRC under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017) and are legally required to carry out identity checks on all clients before we can act on their behalf.

This document explains what information we need from you, why we need it, and what happens if we identify anything that concerns us. We appreciate that these checks may feel intrusive. They are a legal requirement and are designed to protect the integrity of the UK property market and our clients.

2. Who We Must Check

We are required to verify the identity of all clients before we can proceed with any instruction. This applies to:

- Vendors (sellers) instructing us to market a property for sale.
- Buyers making or intending to make an offer on a property.
- Landlords instructing us on a letting or property management agreement.
- Any beneficial owner on whose behalf a transaction is being carried out.
- Representatives of an estate acting under a Grant of Probate or Letters of Administration.
- Corporate clients — companies, trusts, or other legal entities.

We cannot proceed with any instruction until satisfactory identity checks have been completed. This is a legal requirement and is not discretionary.

3. What We Need From You

3.1 Proof of identity — one of the following

Document	Requirements
Current signed passport — any nationality	Must be valid and in date
Valid UK photo card driving licence (full or provisional)	Must be valid and in date
EEA member state identity card	Must be valid and in date

3.2 Proof of address — one of the following

Document	Requirements	Dated within
Bank, building society or credit union statement	*Must include account number and show recent activity — no general correspondence*	*3 months*
Credit card statement	*Must include account number and show recent activity — no general correspondence*	*3 months*
Utility bill (gas, electricity, water)	*Must show address for service and/or account number — no general correspondence*	*6 months*
Telephone bill (landline or mobile pay monthly, not PAYG)	*Must show address for service and/or account number — no general correspondence*	*6 months*
HMRC tax notification	*Must state National Insurance number and tax calculation — no general correspondence*	*6 months*
UK/EU/EEA driving licence (if not used as ID)	*Photo card only, full or provisional — must be valid*	*Valid document*
Mortgage statement (UK, EU, EEA)	*Must show account number — no general correspondence*	*12 months*
Council tax bill	*Must show address for service and/or account number — no general correspondence*	*12 months*
Tenancy agreement	*Must state full name and full property address — issued by local council, housing association, solicitor, or reputable letting agent*	*12 months*
Benefits entitlement letter	*Issued by DWP or Jobcentre Plus — must confirm benefit payable at time of issue*	*12 months*
Home or motor insurance certificate	*Must state insured address or registered vehicle address and policy number — no general*	*12 months*

	correspondence	
Electoral register confirmation or official poll card	*Must state full name and full address — no general correspondence*	*12 months*
UK solicitor's letter confirming house purchase or land registration	*Must state full name of new proprietor and full property address*	*3 months*

3.3 Electronic verification and screening

As well as seeing your documents, we verify your identity electronically using our third-party providers, Compliance Assist and Hipla. This may include a check against credit reference and other databases (it leaves a record on your credit file but does not affect your credit rating) and a digital identity check. We also screen every client against the UK sanctions list, other relevant sanctions lists, and politically exposed person (PEP) and adverse media databases. If a check identifies a possible match, we may ask you for further information before we can proceed.

4. Source of Funds

We ask every buyer for evidence of the source of the funds for their purchase, including the deposit, before a sale is agreed. Your offer will still be passed to the seller promptly, but the sale will not be agreed until these checks are complete. More evidence is needed where the purchase is made without a mortgage (a cash purchase), where the funds come from overseas, or where they include a gift.

Source of funds evidence may include bank statements, sale proceeds documentation, inheritance documentation, or other evidence demonstrating the legitimate origin of the funds. We will tell you what is needed for your specific transaction.

We cannot proceed with a transaction until we are satisfied as to the source of funds. This is part of the checks we carry out under the MLR 2017 and is not negotiable. Where we are unable to verify the source of funds to our satisfaction, we will not proceed.

5. Non-Face-to-Face Clients

Where we are unable to meet you in person — for example where you are based overseas — we will verify your identity in one of two ways, and further checks may apply depending on the circumstances:

- A digital identity check through our provider, which checks your document and takes a live photo (selfie) to confirm it is you; or certified copies of all identity documents. Certification must be by a solicitor, notary, accountant, or other regulated professional, with their name, firm, and the date of certification clearly stated.
- Confirmation that the first payment is made from a bank account held in your own name.
- Additional source of funds documentation where our Money Laundering Reporting Officer requires it, for example for overseas funds or a cash purchase.

6. Probate and Estate Representatives

If you are acting as a representative of a deceased person's estate, we require:

- Grant of Probate — where a will was left.
- Letters of Administration — where no will was left.

- Your own identity evidence and proof of address as the Personal Representative (executor or administrator).

7. Corporate Clients

For clients that are not private individuals — including companies, LLPs, trusts, and other legal entities — we are required to obtain:

- Company registration number and registered address.
- Names and identity documentation for all directors.
- Identification of all beneficial owners — individuals who own or control more than 25% of the entity.
- Evidence that the individuals acting have authority to do so on behalf of the entity.

We will carry out a search at Companies House as part of this process. Where beneficial ownership cannot be confirmed through public registers, we will ask you to provide documentation directly.

8. Suspicious Activity

Spencer James is legally required to report suspicions of money laundering or terrorist financing to the National Crime Agency (NCA). Our nominated Money Laundering Reporting Officer (MLRO) is James Bisset (Director). Our Deputy MLRO is Fabienne Bisset.

Indicators that may give rise to a report include but are not limited to:

New clients

- Reluctance or refusal to provide identity documents.
- Attempting to use intermediaries to conceal identity or involvement in a transaction.
- No apparent genuine reason for using our services.

All clients

- Funds being paid by or to a third party with no apparent connection to the transaction.
- A cash purchase where the source of funds cannot be satisfactorily explained.
- A transaction that is unusually large or structured in an unusual way.
- A transaction at a price significantly below or above market value.
- Unusual urgency or pressure to complete a transaction quickly.

If we are required to make a report to the NCA, we are legally prohibited from telling you that a report has been made or that you are under suspicion. To do so would be a criminal offence known as tipping off. We apologise in advance if this means we are unable to explain a delay in progressing your transaction.

9. Record Keeping

We are required to retain copies of all identity and address verification documents for 5 years from the end of the business relationship or the completion of the transaction, whichever is later, and then securely delete

them unless the law requires us to keep them longer. All records are held securely in accordance with our Data Protection Policy and UK GDPR obligations. Details of how we process your personal data are set out in our Privacy Notice, available on request and on our website.

10. Contact

If you have any questions about our AML procedure or what documents you need to provide, please contact:

Money Laundering Reporting Officer	James Bisset
Deputy MLRO	Fabienne Bisset
Email	mail@spencer-james.co.uk
Telephone	020 7474 3636
Address	8a Hartlepool Court, London, E16 2RL
HMRC supervision reference	XJML00000102001

Spencer James Residential Limited is supervised by HMRC for anti-money laundering purposes under registration XJML00000102001. This document is reviewed annually. Last updated September 2026.