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## Money Laundering Policy

### 1. Policy Statement

Pro Garden Projects are committed to preventing money laundering and the financing of terrorism. We are dedicated to complying with all applicable anti-money laundering (AML) and counter-terrorist financing (CTF) laws and regulations in the UK. This policy outlines our commitment to detecting and preventing activities associated with money laundering and terrorist financing within our business operations.

### 2. Compliance with AML/CTF Laws

Our company acknowledges and adheres to the legal obligations set forth by the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended from time to time. We are committed to implementing effective AML/CTF procedures and controls to prevent our business from being used for illegal purposes.

### 3. Risk Assessment

We will conduct a risk assessment of our business operations to identify and assess potential risks of money laundering and terrorist financing. This will include an evaluation of our customer base, types of services provided, and geographic locations in which we operate.

### 4. Customer Due Diligence

Our company will implement customer due diligence processes to verify the identity of our customers and to assess the nature and purpose of the business relationship. Enhanced due diligence measures will be applied to higher-risk customers and transactions.

### 5. Record-Keeping

We will maintain accurate records of customer due diligence, transactions, and other relevant documentation in accordance with the requirements of legislation. These records will be retained for the legally required period and will be made available for inspection by relevant authorities if necessary.

### 6. Reporting Suspicious Activity

Employees are encouraged to report any suspicions of money laundering or terrorist financing. Our company will have procedures in place for reporting and escalating such suspicions to the appropriate authorities as required by law.

#### 7. Sanctions Compliance

Our company will comply with all relevant sanctions regulations and will implement procedures to screen customers and transactions against sanctions lists to prevent engagement with sanctioned individuals, entities, and countries.

#### 8. Continuous Improvement

We are committed to continuously improving our practices and procedures. We will regularly review and update this policy to ensure its effectiveness and relevance to our business operations.

#### 9. Accountability

The management team of our company is ultimately responsible for ensuring the effective implementation of this policy and for providing the necessary resources to support compliance with laws and regulations.

It is important that all employees understand and adhere to this policy. This policy will be communicated to all employees and made available for public access.