

Anti-Money Laundering Policy

Muir Myles Laverty take a zero-tolerance approach to being involved in illegal/illicit activity, and will fully comply with all relevant sections of The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017), the [Proceeds of Crime Act 2002](#) (POCA), and the [Terrorism Act 2000](#) (TACT). All partners and employees of the firm are under an obligation and duty to comply with the above. This policy & any related procedures aims to help partners and staff fulfil these responsibilities, by providing a clear framework, along with setting out the firm's key principles and obligations.

To ensure compliance with the law and to ensure we know and fully understand the identity and structures of our clients we have robust anti-money laundering policies and procedures in place.

We conduct due diligence enquiries on all new clients to establish and verify our clients' identity and the identity of any beneficial owners. We may also undertake such enquiries on anyone instructing us on behalf of, but who may not be our clients. We cannot act if sufficient information is not provided.

We require to see original documentation. You will need to speak to us if you cannot produce this. We may use third party providers who search external electronic databases as part of this diligence process. Any personal data received from you will only be processed for the purposes of preventing money laundering or terrorist financing unless permitted by law or unless you provide consent.

We also undertake risk assessments for all new matters for existing clients.

We undertake on-going monitoring of all existing clients. This may require you to provide us with updated proof of identity documentation.

We are required to know the source of funds involved in the transactions we are undertaking. We will also have to enquire about the source of your wealth. We accept no responsibility for any transactions being delayed while we await this information.

We must report to the [National Crime Agency](#) and other relevant authorities any suspicion or knowledge regarding money laundering or the proceeds of crime. We are not permitted to notify you of the fact that such reports have been made.

Any personal data that we receive will only be processed for Anti-Money laundering purposes and as required by law. This may include advising our bank about our clients for whom we hold money. Unless we agree with you otherwise we shall retain your data for whichever period is the longer of the period (i) we are required to do so by law or (ii) for as long as we are required by the [Law Society of Scotland](#) to store your file which can be up to 20 years and in some cases longer. Unless you agree with us otherwise, you authorise us to delete your case file from our system when our paper file is destroyed.

Confidentiality

Our legal duties to report to the [National Crime Agency](#) and any other relevant authorities may take priority over any duty to keep your information and the detail of your transactions confidential.