

Hybridan Anti Money Laundering Policy

Hybridan LLP (“Hybridan”) is committed to participating in efforts to deter, detect and report suspected money laundering and terrorist financing activities as well as meeting our obligations to do so as an FCA authorised and regulated firm in the UK.

For the protection of our clients and in order to comply with our professional obligations, we operate a money laundering reporting procedure. We are required by law to check a client’s identity and in some cases the identity of people connected with the client. In order to verify the information you provide we may make searches about the client with an electronic search provider or fraud prevention agency. We will ask the client to supply at least two original documents of confirmation of their identity and address, which we will use along with any electronic searches we may perform. Any documents provided to us will be recorded and copied for audit purposes as part of our anti money laundering requirements. In certain circumstances we may have an obligation to reveal information to the appropriate authorities in relation to any suspicion of money laundering.

Hybridan may make such enquiries and obtain such references as it may consider necessary to fulfil its statutory obligations under the Anti-Money Laundering legislation.

Hybridan has developed a set of risk-based policies, procedures and processes outlining its AML standards and principles, which apply appropriate risk-based scrutiny and monitoring measures to clients, particularly those whose business activities are known to be susceptible to criminal activity or who have been designated as high-risk for money laundering or terrorist activity financing.

This includes risk-based verification of client identity, record keeping and retention, reporting of attempted and completed suspicious transactions, sanctions screening, processes to keep required records; and regular staff training and awareness.

Hybridan is committed to the continuous development and maintenance of these policies, guidelines, training and risk-assessment tools and models, consistent with national requirements, to help our employees deal with ever-evolving money laundering and terrorism financing risks. The policies are supported and approved by the board and reviewed on a regular basis.

Our profession imposes a strict duty upon us to make a report to the National Crime Agency (NCA) if we know or suspect, or have reasonable grounds for suspecting, that any person has entered into, or proposes to enter into, any arrangement which facilitates the acquisition, retention, use, control, concealment or conversion of criminal property by or on behalf of another person.

The law obliges us to make such reports in a way which will not provide the suspected person with information which will warn them of an investigation which is either in progress or likely. We are obliged not to inform anyone of the fact of a report having been made. We may be required to suspend work on the matter in question pending receipt of consent from the NCA.

Employees who engage in or facilitate money laundering, or who fail to comply with all applicable anti-money laundering regulations and Hybridan’s related policies, may be subject to disciplinary action, up to and including termination. Hybridan reserves the right to terminate immediately any business relationship that violates our high ethical standards and our commitment to responsible business practices.