

MONEY LAUNDERING SUSPICIOUS ACTIVITY REPORTING PROCEDURE

1. The Mohua Affordable Housing Trust (MAHT) Money Laundering Reporting Officer ('the MLRO') is: **Christopher R. Bennett**. E-mail address: chris@lpcb.org. Mobile Phone: **027 846 2004**.
2. The following forms are annexed hereto: -
 - a) An uncompleted Internal Suspicious Activity Report (SAR) Form; and
 - b) An uncompleted External Suspicious Activity Report Form.
3. Any concerns should be reported to the MLRO using the Internal Suspicious Activity Report Form as soon as possible after they arise. The range of concerns it is expected that Trustees or project staff may have, without limitation, are concerns over suspicious transactions, Customers or any other matters that are affected by the anti-money laundering regulations.
4. Even if a new Customer is not taken on for any reason, the need to report can still arise. Where in the course of discussions, matters of a suspicious nature come to the attention of a Trustee or staff, that person should attempt to gather as much information as possible and make a disclosure report in exactly the same manner as if that person were a Customer.
5. Whilst (internal) concerns may be discussed with the MLRO, those concerns must, **as soon as possible**, be recorded in an Internal Suspicious Activity Report Form and sent by e-mail to the MLRO. (If the MLRO is not in the office then the Trustee or project staff should telephone the MLRO to communicate the concerns and indicate that an e-mail attaching the Internal Suspicious Activity Report Form has been sent by e-mail to the MLRO). The Internal Suspicious Activity Report Form should contain as full a statement as possible of the information giving rise to the knowledge, suspicion or reasonable grounds for knowledge or suspicion of money laundering or terrorist financing activity and full details of the Customer.
6. Where a matter is discussed with the MLRO after the Internal Suspicious Activity Report has been sent to the MLRO, the Trustees or project staff should make an Attendance Note of the discussions and present it the MLRO within 48 hours for their comments. The Attendance Note is to be finalised as soon as possible thereafter and countersigned by the member staff and the MLRO. Any other communications will be in writing.
7. The MLRO will report back to the Trustees or project staff who raised the concerns in writing explaining the reasons for either reporting the Customer to the authorities or the decision not to report the Customer.
8. The MLRO will maintain a file containing copies of all documents referred to above in relation to each Internal Suspicious Activity Report and any External Suspicious Activity Reports, together with any documents generated by the MLRO during their review of the Internal Suspicious Activity Report.
9. All Trustees and project staff should bear in mind that if they fail, without reasonable excuse, to make an internal SAR, where they have knowledge, suspicion or reasonable grounds for knowledge or suspicion of money laundering or terrorist financing activity they could be subject to disciplinary action.
10. It should be noted that making an internal report on a Customer or potential Customer is not a 'once and for all' activity and any further circumstances that give rise to suspicion of money laundering should also be reported. This applies whether or not the MLRO had decided to make an external report.
11. All Trustees and project staff are reminded that where they are involved with the filing of an Internal Suspicious Activity Report or asked questions in relation to it, they are **under no circumstances** to communicate to the Customer (or any other third party referred to in the Report) any information which may prejudice law enforcement enquiries. If they have any concerns in this respect they should be discussed with the MLRO.

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12. It is finally noted that if the MLRO has any concerns, they are to ensure that the concerns are fully documented and that, at the first stage, the MLRO completes an Internal Suspicious Activity Report Form, in order to document those concerns.

Money Laundering Suspicious Activity Internal Report (MLIR)

Section A

Name or originator Job Title

Customer

Entities suspected of involvement

Details of transaction or activity

Basis for suspicion

Signed (staff member) _____

Section B

Instructions from MLRO

Details of all staff who are aware of this report

Signed (MLRO) _____

Date: _____

Section C

Details of interviews with other staff members

Name:

Date:

Instructions given:

Name:

Date:

Instructions given:

Details of other investigations carried out by the MLRO, e.g. internet searches, archived records, media enquiries:

Section D

(i) The report did not require external disclosure

Date of closure _____

Staff member
Advised _____

Signed by MLRO _____

(ii) The report did require external disclosure

Date of report
To FIU _____

Instructions received: