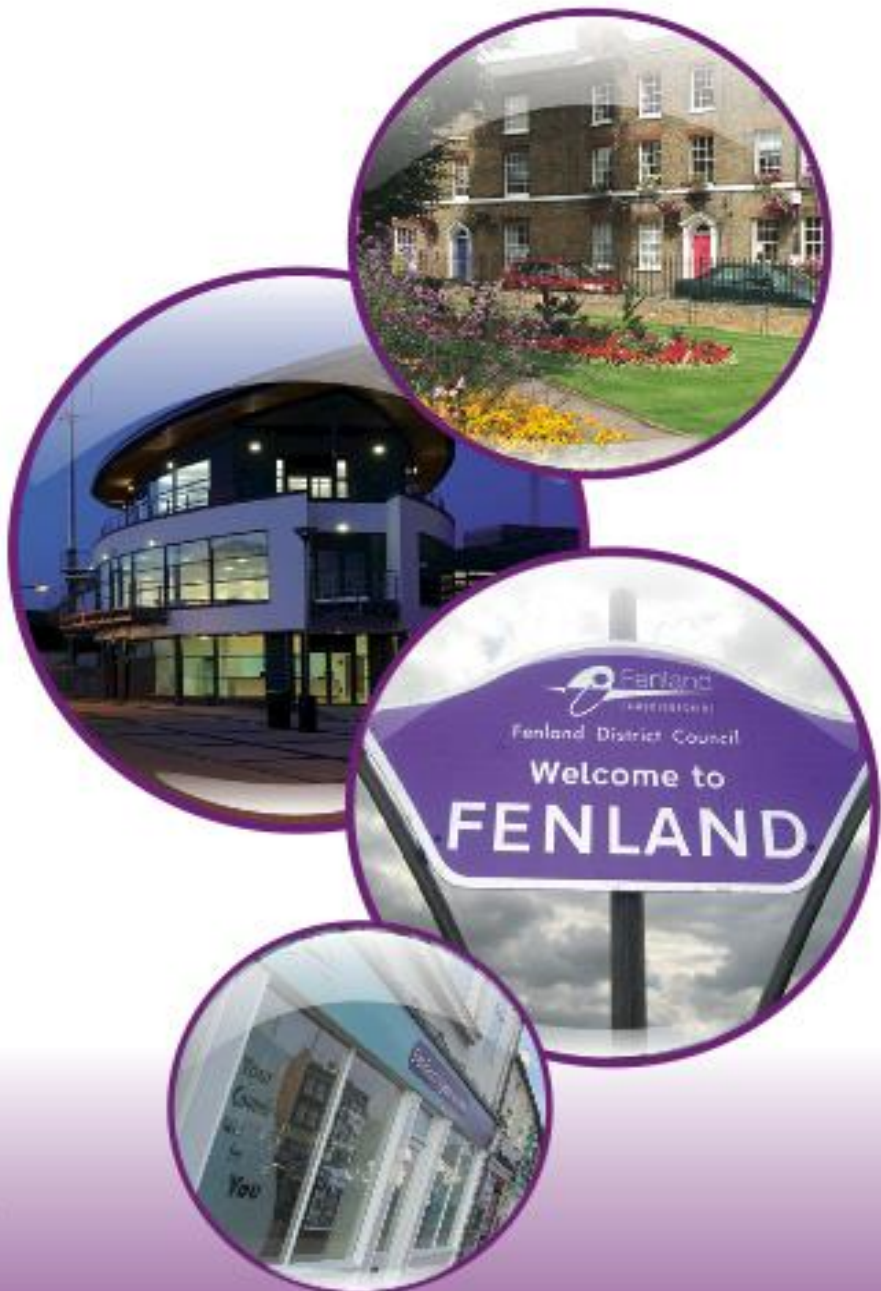


Anti-Money Laundering Policy

Version 1.0

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ANTI-MONEY LAUNDERING POLICY

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1 INTRODUCTION

- 1.1 The Proceeds of Crime Act 2002 (the **Act**), the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and the Money Laundering and Terrorist Financing (Amendment) Regulations 2019 (effective from 1st October 2020) place obligations on the Council and its employees to establish internal procedures to prevent the use of their services for money laundering.
- 1.2 Whilst the risk to the Council of contravening the Act and the Regulations is **very low**, the obligations impact on certain areas of Local Authority business and require Local Authorities to establish internal procedures to prevent the use of their services for money laundering. This Policy outlines the Council's and its subsidiary companies' responsibility to comply with the relevant legislation.

2 SCOPE OF THE POLICY

- 2.1 This Policy applies to **all** employees of the Council or its subsidiary companies, elected members and agency workers, and aims to maintain the high standards of conduct which currently exist within the Council by preventing criminal activity through money laundering. The Policy sets out the procedures which must be followed (for example the reporting of suspicions of money laundering activity) to enable the Council to comply with its legal obligations.
- 2.2 The Policy sits alongside the Council's Whistleblowing Policy and Anti-Fraud and Corruption Policy, the Council's Code of Conduct for Employees, Procedure for dealing with Misconduct and its Disciplinary Rules.
- 2.3 Failure by a member of staff to comply with the procedures set out in this Policy may lead to disciplinary action being taken against them. Any disciplinary action will be dealt with in accordance with the Council's Disciplinary and Capability Procedure.
- 2.4 The Council's policy in relation to money laundering is to do all it reasonably can to:
 - prevent, where possible, the Council, its subsidiary companies, employees, members and agency workers from being exposed to money laundering practices;
 - identify the areas where it may potentially occur; and
 - comply with all legal requirements, especially those relating to reporting.

3 WHAT IS MONEY LAUNDERING?

- 3.1 Money laundering is the term used for several offences involving the proceeds of crime or terrorism funds. It involves the "cleaning" of illegal proceeds of crime to disguise their criminal origin. Those proceeds are introduced into an organisation's systems, are processed and leave the systems so that they appear to have come from a legitimate source.
- 3.2 The term goes beyond the transformation of the proceeds of crime into money or assets. The term also covers a range of activities, which do not necessarily need to involve money. The following constitute the act of money laundering:
 - concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of the Act):

- entering into or becoming concerned in an arrangement which you know or suspect facilitates (by whatever means) the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328 of the Act);
- acquiring, using or possessing criminal property (section 329 of the Act)

These are the **primary** money laundering offences and thus prohibited acts under the legislation.

There are also three secondary offences: failure to disclose knowledge or suspicion of money laundering where this knowledge or suspicion is acquired in the course of work (section 330 of the Act) and tipping off and prejudicing an actual or potential investigation (sections 333A and 342 of the Act)

Tipping off is where someone informs a person or people who are, or who are suspected of being involved in money laundering, in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.

- 3.3 Potentially any member of staff could be caught by the money laundering provisions if they suspect money laundering and either become involved with it in some way and/or do nothing about it.
- 3.4 “Criminal property” is widely defined as a person’s benefit from criminal conduct. It includes all property, real or personal (situated in the UK or abroad), including money, and also includes an interest in land or a right in relation to property other than land. It does not matter how small the value of the benefit is.
- 3.5 Whilst the risk to the Council of contravening the legislation is very low in practical terms, it is extremely important that all employees are familiar with their legal responsibilities: serious criminal sanctions may be imposed for breaches of the legislation. Even if a money laundering investigation does not result in a conviction, the individual or individuals concerned, as well as the Council, are likely to suffer severe reputational damage as a result.

The key requirement on employees is to promptly report any suspected money laundering activity to the Money Laundering Reporting Officer (MLRO).

4 WHAT ARE THE OBLIGATIONS ON THE COUNCIL AND SUBSIDIARY COMPANIES?

4.1 Organisations conducting “relevant business” must:

- appoint a Money Laundering Reporting Officer (“MLRO”) (or Nominated Officer (“NO”) as they are sometimes referred) to receive disclosures/reports from employees of money laundering activity (their own or anyone else’s - i.e., of a client, colleague, member of the public etc.);
- appoint a Compliance Officer¹ with sufficient authority to ensure that appropriate due diligence arrangements are in place and operating effectively for relevant services, where there is significant exposure to the risk of money laundering;
- implement a procedure to enable the reporting of suspicions of money laundering;
- maintain client identification (customer due diligence) procedures in certain circumstances;
- obtain information on the purpose and nature of certain proposed transactions/business relationships;

¹ Within the Council this role is best discharged by the Monitoring Officer

- conduct ongoing monitoring of certain business relationships;
- maintain record keeping procedures and other specified procedures on a risk sensitive basis;
and
- train relevant staff

4.2 Not all of the Council's business is "relevant" for the purposes of the legislation: it is mainly the accountancy and audit services carried out by Financial Services and the financial, company and property transactions undertaken by Legal Services that are caught by the Act. However, the safest way to ensure compliance with the law is to apply them to all areas of work undertaken by the Council and its subsidiary companies; therefore, all staff are required to comply with the Disclosure/Reporting procedure set out in Section 6 (below).

4.3 CIPFA guidance notes that public authorities are not legally obliged to apply the provisions of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and the Money Laundering and Terrorist Financing (Amendment) Regulations 2019, but as responsible public bodies, they should employ policies and procedures which reflect the essence of the UK's anti-money laundering regime.

4.4 In addition to ongoing monitoring, the Policy will be revised to the extent that the implications of money laundering to Local Authorities are developed via new professional guidance, legal precedent or case law.

4.5 The following sections of this Policy provide further detail about the requirements listed in paragraph 4.1.

5 THE MONEY LAUNDERING REPORTING OFFICER – (MLRO)

5.1 The officer nominated to receive disclosures about money laundering activity within the Council is the Chief Finance (s151) Officer who can be contacted as follows:

Fenland District Council

Fenland Hall

County Road

March

Cambs.

PE15 8NQ

e-mail petercatchpole@fenland.gov.uk

5.2 In the absence of the MLRO, the Council's Head of Governance and Legal Services is authorised to deputise and can be contacted at the above address.

5.3 The legislation in this area is complex and anyone requiring further information or with any queries whatsoever in connection with this policy should contact the MLRO or his/her deputy.

6 DISCLOSURE PROCEDURE

Cash payments

- 6.1 No payment to the Council will be accepted in cash (including notes, coins or cheques in any currency) if it exceeds £5,000.

Reporting to the Money Laundering Reporting Officer

- 6.2 Where you know or suspect that money laundering activity is taking/has taken place or become concerned that your involvement in a matter may amount to a prohibited act under the Act, you must disclose this as soon as practicable to the MLRO. The disclosure should be within “hours” of the information coming to your attention, not weeks or months later. **SHOULD YOU NOT DO SO, THEN YOU MAY BE LIABLE TO PROSECUTION.**

- 6.3 Disclosure should be made to the MLRO using the proforma report attached at Appendix 1. The report must include as much detail as possible, for example:

- Full details of the people involved (including yourself, if relevant), e.g., name, date of birth, address, occupation, company names, directorships, phone numbers, etc.;
- Full details of the property involved and its whereabouts (if known);
- Full details of the nature of both their/your involvement:
 - If you are concerned that your involvement in the transaction would amount to a prohibited act under sections 327 – 329 of the Act, then your report must include all relevant details, as you will need consent from the National Crime Agency (NCA) via the MLRO, to take any further part in the transaction - this is the case even if the client gives instructions for the matter to proceed before such consent is given.
 - You should therefore make it clear in the report if such consent is required and clarify whether there are any deadlines for giving such consent e.g., a completion date or court deadline;
 - Just because you do not know who has committed an offence though does not avoid the need for a report to be made.
- The types of money laundering activity involved:
 - if possible, cite the section number(s) under which the report is being made eg a principal money laundering offence under section 327 – 329 of the Act, or general reporting requirement under section 330 of the Act, or both;
- The dates of such activities, including:
 - whether the transactions have happened, are ongoing or are imminent;
 - Where they took place;
 - How they were undertaken;
 - The (likely) amount of money/assets involved; and
 - The reasons why, exactly, you are/became suspicious – the NCIS will require full reasons.

Plus any other available information to enable the MLRO to make a sound judgment as to whether there are reasonable grounds for knowledge or suspicion of money laundering and to enable them to prepare their report to the NCA, where appropriate. You should also enclose copies of any relevant supporting documentation.

It is not necessary to make a report if:

- You cannot establish the identity of the person suspected of committing the money laundering offence:
- You cannot identify the whereabouts of the criminal property: and
- You do not believe (and it is not reasonable to believe) that the information you have may assist in identifying the money laundering or the whereabouts of the criminal property.

This means that cases of pilferage, fraud or theft by persons unknown will not normally need to be reported. However, always consult the MLRO if you are in any doubt. Always exercise common sense and err on the side of caution.

- 6.4 Once you have reported the matter to the MLRO you must follow any directions they may give you. You must NOT make any further enquiries into the matter yourself: any necessary investigation will be undertaken by the NCA. Simply report your suspicions to the MLRO who will refer the matter on to the NCA if appropriate. All members of staff will be required to co-operate with the MLRO and the authorities during any subsequent money laundering investigation.
- 6.5 Similarly, at no time and under no circumstances should you voice any suspicions to the person(s) whom you suspect of money laundering, even if the NCA has given consent to a particular transaction proceeding, without the specific consent of the MLRO; otherwise, you may commit a criminal offence of “tipping off” (section 342 of the Act) (see the Guidance Note for further details).
- 6.6 Do not, therefore, make any reference on any public facing file to a report having been made to the MLRO – should the person reported exercise their right to see the file (Data Protection Act 1998/ Freedom of Information Act 2000), then (subject to the exercise of any relevant exemptions under those Acts) such a note will tip them off to the report having been made and may render you liable to prosecution. The MLRO must keep the appropriate records in a confidential manner.

Consideration of the disclosure by the Money Laundering Reporting Officer

- 6.7 Upon receipt of a disclosure report, the MLRO must note the date of receipt on his/her section of the report and acknowledge receipt of it. They should also advise you of the timescale within which they expect to respond to you. This will usually be within 10 working days.
- 6.8 The MLRO will consider the report and any other available internal information they think relevant e.g.:
 - reviewing other transaction patterns and volumes;
 - the length of any business relationship involved;
 - the number of any one-off transactions and linked one-off transactions;
 - any identification evidence held;

and undertake such other reasonable inquiries they think appropriate to ensure that all available information is considered in deciding whether a suspicious activity report to the

NCA is required (such enquiries being made in such a way as to avoid any appearance of tipping off those involved). The MLRO may also need to discuss the report with you. You must co-operate fully with the MLRO at all times.

- 6.9 Once the MLRO has evaluated the disclosure report and any other relevant information, they must make a timely determination as to whether:
- there is actual or suspected money laundering taking place; or
 - there are reasonable grounds to know or suspect that is the case;
 - they know the identity of the money launderer or the whereabouts of the property involved or they could be identified or the information may assist in such identification; and
 - whether they need to seek consent from the NCIS for a particular transaction to proceed.
- 6.10 Where the MLRO does so conclude, then they must disclose the matter as soon as practicable to the NCA on their standard report form and in the prescribed manner, unless they have a reasonable excuse for non-disclosure to the NCA (for example, if you are a lawyer and you wish to claim legal professional privilege for not disclosing the information).
- 6.11 Where the MLRO suspects money laundering but has a reasonable excuse for non-disclosure, then they must note the report accordingly; they can then immediately give their consent for any ongoing or imminent transactions to proceed.
- 6.12 In cases where legal professional privilege may apply, the MLRO must liaise with the legal adviser to decide whether there is a reasonable excuse for not reporting the matter to the NCA.
- 6.13 Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has specifically given consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.
- 6.14 The MLRO may receive appropriate consent from NCA in the following ways;
- specific consent received within the notice period (7 (seven) working days starting with the first working day after the MLRO makes the disclosure); or
 - implied consent following no NCA response upon expiry of the notice period; or
 - refusal of consent during the notice period but no NCA response upon expiry of the moratorium period (31 (thirty one) working days starting with the day the MLRO receives notice of refusal of consent)
- 6.15 Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then they shall mark the report accordingly and give their consent for any ongoing or imminent transaction(s) to proceed.
- 6.16 All disclosure reports referred to the MLRO and reports made by them to the NCIS must be retained by the MLRO in a confidential file kept for that purpose, for a minimum of 5 (five) years.
- 6.17 The MLRO commits a criminal offence if they know or suspect, or have reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and they do not disclose this as soon as practicable to the NCA.
- 6.18 NCA reporting forms can be found on the NCA website: www.nationalcrimeagency.gov.uk

7 CLIENT IDENTIFICATION PROCEDURE

7.1 Where the Council is carrying out relevant and regulated business (accountancy, audit and certain legal services) and:

- forms an ongoing business relationship with a client;
- undertakes an occasional transaction amounting to 15,000 Euro (approximately £13,000) or more whether carried out in a single operation or several linked ones;
- suspects money laundering or terrorist financing; or
- doubts the veracity or adequacy of information previously obtained for the purposes of client identification or verification

then customer due diligence measures must be applied and this Customer Due Diligence (CDD) Procedure must be followed before the establishment of the relationship or carrying out of the transaction.

7.2 CDD means:

- identifying the customer and verifying the customer's identity on the basis of documents, data or information obtained from a reliable and independent source;
- identifying, where there is a beneficial owner who is not the customer, the beneficial owner and taking adequate measures, on a risk-sensitive basis, to verify their identity so that the relevant person is satisfied that they know who the beneficial owner is, including, in the case of a legal person, trust or similar legal arrangement, measures to understand the ownership and control structure of the person, trust or arrangement; and
- obtaining information on the purpose and intended nature of the business relationship.

* Please note that unlike the reporting procedure, the CDD procedure is restricted to those undertaking relevant business, e.g. Financial/ Audit Services and Legal Services.

7.3 In the above circumstances, staff in the relevant unit of the Council must obtain satisfactory evidence of the identity of the prospective client, as soon as practicable after instructions are received (unless evidence of the client has already been obtained). This applies to existing clients, as well as new ones, but identification evidence is not required for matters entered into prior to 1 March 2004.

7.4 Once instructions to provide relevant business have been received, and it has been established that any of paragraphs 7.1 (a) to (d) apply, evidence of identity should be obtained as follows.

Internal clients:

Appropriate evidence of identity for Council departments will be (1) signed, written instructions on Council headed notepaper or (2) an email on the internal email system at the outset of a particular matter. Such correspondence should then be placed on the Council's client file along with a prominent note explaining which correspondence constitutes the evidence and where it is located.

External Clients:

For external clients of the Council, such as Cambridgeshire County Council, the Police, other statutory bodies and agencies, appropriate evidence of identity will be (1) written instructions on the organisation's official letterhead at the outset of the matter or (2) an

email from the organisation's e-communication system. Such correspondence should then be placed on the Council's client file along with a prominent note explaining which correspondence constitutes the evidence and where it is located.

With instructions from new clients, or further instructions from a client not well known to you, you may wish to seek additional evidence of the identity of key individuals in the organisation and of the organisation itself: (please see the Guidance Note for more information).

- 7.5 In all cases, the evidence should be retained for at least 5 (five) years from the end of the business relationship or one-off transaction(s).
- 7.6 If satisfactory evidence of identity is not obtained at the outset of the matter then the business relationship or one off transaction(s) cannot proceed any further.
- 7.7 The Regulations regarding CDD are detailed and complex, but there are some simple questions that will help decide if it is necessary:
- Is the service a regulated activity?
 - Is the Council charging for the service i.e., is it 'by way of business'?
 - Is the service being provided to a customer other than a UK public authority?

If the answer to any of these questions is no, then there is no need to carry out CDD.

If the answer to all these questions is yes, then CDD must be carried out before any business is undertaken for that client. If there is uncertainty whether CDD is required then the MLRO should be contacted for advice.

- 7.8 Regulated activity is defined as the provision 'by way of business' of: advice about tax affairs; accounting services; treasury management, investment or other financial services; audit services; legal services; estate agency; services involving the formation, operation or arrangement of a company or trust or; dealing in goods wherever a transaction involves a cash payment of €15,000 or more."
- 7.9 Where CDD is required then evidence of identity must be sought, for example:
- checking with the customer's website to confirm their business address;
 - conducting an on-line search via Companies House to confirm the nature and business of the customer and confirm the identities of any directors;
 - seeking evidence from the key contact of their personal identity, for example their passport, and position within the organisation.
- 7.10 The requirement for CDD applies immediately for new customers and should be applied on a risk sensitive basis for existing customers. Ongoing CDD must also be carried out during the life of a business relationship but should be proportionate to the risk of money laundering and terrorist funding, based on the officer's knowledge of the customer and a regular scrutiny of the transactions involved.
- 7.11 If, at any time, it is suspected that a client or customer for whom the Council is currently, or is planning to carry out, a regulated activity is carrying out money laundering or terrorist financing or has lied about their identity then this must be reported to the MLRO.
- 7.12 In certain circumstances enhanced CDD must be carried out for example where:
- The customer has not been physically present for identification;
 - The customer is a politically exposed person; or

- There is a beneficial owner who is not the customer – a beneficial owner is any individual who holds more than 25% of the shares, voting rights or interest in a company, partnership or trust.

7.13 Enhanced CDD could include any additional documentation, data or information that will confirm the customer's identity and / or the source of the funds to be used in the business relationship / transaction. If it is believed that enhanced CDD is required then the MLRO should be consulted prior to carrying it out.

7.14 The Compliance Officer is responsible for gaining assurance that appropriate CDD procedures are in place.

8 RECORD KEEPING PROCEDURES

8.1 Each team of the Council/subsidiary company conducting regulated business must monitor, on an ongoing basis, their business relationships in terms of scrutinising transactions undertaken throughout the course of the relationship (including, where necessary, the source of funds) to ensure that the transactions are consistent with their knowledge of the client, its business and risk profile.

8.2 Each unit of the Council/subsidiary company conducting relevant business must maintain records of:

- client identification evidence obtained; and
- details of all relevant business transactions carried out for clients.

for at least 5 (five) years from the end of the transaction / relationship. This is so that they may be used as evidence in any subsequent investigation by the authorities into money laundering.

8.3 The precise nature of the records is not prescribed by law however they must be capable of providing an audit trail during any subsequent investigation, for example distinguishing the client and the relevant transaction and recording in what form any funds were received or paid. In practice, the business units of the Council will be routinely making records of work carried out for clients during normal business and these should suffice in this regard.

9 TRAINING

9.1 The Council will take appropriate measures to ensure that all employees are made aware of the law relating to money laundering and will arrange targeted, ongoing, training to key individuals most likely to be affected by the legislation.

10 RISK MANAGEMENT AND INTERNAL CONTROL

10.1 The risk to the Council of contravening the anti-money laundering legislation will be assessed on a periodic basis and the adequacy and effectiveness of the Anti-Money Laundering Policy, Guidance and procedures will be reviewed in light of such assessments.

10.2 The adequacy and effectiveness of, promotion of, and compliance by employees with, the documentation and procedures will also be monitored through the Council's Corporate Governance and Anti-Fraud and Corruption Policy frameworks.

11 CONCLUSION

The legislative requirements concerning anti-money laundering procedures are lengthy and complex. This Policy has been written to enable the Council to meet the legal requirements in a way which is proportionate to the very low risk to the Council of contravening the legislation.

Should you have any concerns whatsoever regarding any transactions then you should contact the MLRO.

12 FURTHER INFORMATION

12.1 Further information can be obtained from the MLRO and the following sources:

- **www.nationalcrimeagency.gov.uk** – website of the National Crime Agency
- “Proceeds of Crime (Anti-Money Laundering) – Practical Guidance for Public Service Organisations” – CIPFA
- “Anti-Money Laundering (Proceeds of Crime and Terrorism) – Second Interim Guidance for Accountants” – CCAB (**www.ccab.org.uk**)
- Money Laundering Guidance at **www.lawsociety.org.uk**
- SI 2007 No. 2157 The Money Laundering Regulations 2007 at: http://www.hmtreasury.gov.uk/consultations_and_legislation/
- Joint Money Laundering Steering Group (JMLSG): [JMLSG – Joint Money Laundering Steering Group](#)

APPENDIX 1 - Suspicious Transaction Report Form

CONFIDENTIAL - Report to Money Laundering Reporting Officer

Re: Money Laundering Activity

Please complete ALL sections of this form: If any information is not known or not applicable, please state accordingly.

To: Money Laundering Reporting Officer

From: [insert name of employee]

Directorate: [insert post title and Business Unit] Ext/Tel No:

Details of suspected offence:

Name(s) and address(es) of person(s) involved:
[if a company/public body please include details of nature of business]

Nature, value and timing of activity involved:
[Please include full details e.g. what, when, where, how. Continue on a separate sheet if necessary]

Nature of suspicions regarding such activity:
[Please continue on a separate sheet if necessary]

Has any investigation been undertaken (as far as you are Yes No
aware)?
[Please tick the relevant box]

If yes, please include details below:

Have you discussed your suspicions with anyone else?
[Please tick the relevant box]

Yes

No

If yes, please specify below, explaining why such discussion was necessary:

Have you consulted any supervisory body guidance re money
laundering? (e.g., the Law Society) [Please tick the
relevant box]

Yes

No

If yes, please specify below:

Do you feel you have a reasonable excuse for not disclosing
the matter to the NCIS? (e.g., you a lawyer and wish to
claim legal professional privilege?)

Yes

No

[Please tick the relevant box]

If yes, please set out full details below:

Are you involved in a transaction which might be a prohibited act under sections 327- 329 of the Act which requires appropriate consent from NCA? Yes No

[Please tick the relevant box]

If you/the Council are involved in any arrangement which may assist a third party to acquire, retain, use or control criminal property you must not take any further steps without the MLRO's consent; You must not deal with any suspect funds without the MLRO's consent.

If yes, please enclose details in the box below:

Please set out below any other information you feel is relevant:

Signed:..... Dated:.....

Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. To do so may constitute a "tipping off" offence, which carries a maximum penalty of 5 years' imprisonment.

THE FOLLOWING PART OF THIS FORM IS FOR COMPLETION BY THE MLRO

Date report received:

Date receipt of report
acknowledged:

consideration of disclosure:

Action plan:

Outcome of consideration of disclosure:

Are there reasonable grounds for suspecting money laundering activity?

If there are reasonable grounds for suspicion, will a report be made to NCA? [Please tick the relevant box] Yes No

If yes, please confirm date of report to NCA and complete the box below:

Details of liaison with the NCA regarding the report:			
Notice Period:		To	
Moratorium Period:		To	

Is consent required from the NCA to any ongoing or imminent transactions which would otherwise be prohibited acts? Yes No

If yes, please confirm full details in the box below:

--

Date consent received from NCIS:	
Date consent given by you to employee:	

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to the NCA, please set out below the reason(s) for non-disclosure:

[Please set out any reasonable excuse for non-disclosure]

Date consent given by you to employee for any prohibited act transactions to proceed:	
---	--

Other relevant information:

Signed:..... Dated:.....

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS