Anti-Money Laundering Policy

This policy sets out Bromford Flagship LiveWest's approach to addressing anti-money laundering and terrorist financing in support of delivering safe, fair and responsive services to our customers. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Risk	
Policy owner	Group Insurance and Financial Crime Manager	
Approved date	**February 2026**	
Date for review	**February 2029**	
Approving body	Audit and Risk Committee	
Associated legislation/regulation	Bribery Act 2010 Criminal Finances Act 2017 Data Protection Act 2018 Economic Crime and Corporate Transparency Act 2023 Fraud Act 2006 General Data Protection Regulations	Human Rights Act 1998 Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 Proceeds of Crime Act 2002 (Part 7) Public Interest Disclosure Act 1998
Legal advice from	None required	
Equality impact assessment date	9 January 2026	
Version number	**1.2**	
Publication status	Internal	
Approval	This policy was approved by Audit and Risk Committee and is applicable to: • Bromford Flagship LiveWest Ltd • Bromford Housing Association Ltd (operating as Bromford) • Bromford Home Ownership Ltd (operating as Bromford) • Merlin Housing Society Ltd (operating as Bromford) • Flagship Housing Limited (operating as Flagship) • LiveWest Homes Ltd (operating as LiveWest) Any references to Bromford Flagship LiveWest should be interpreted as equally applicable to all the above.	

Purpose/principles

The Group is committed to preventing money laundering (including terrorist financing) and fostering a culture of honesty, integrity, and transparency. We maintain a zero-tolerance approach to all financial crime and expect all colleagues to act with honesty and always uphold the highest ethical standards.

Scope

This policy applies to all confirmed or suspected instances of money laundering (including terrorist financing) involving all Group colleagues, as well as any individuals or organisations with whom we maintain a business relationship, this includes associated persons working for, or on behalf of the Group.

This policy forms part of our broader financial crime framework and reinforces our commitment to fostering a workplace culture grounded in integrity, transparency, and ethical conduct. These principles are upheld consistently and without exception across all areas of our business.

Roles/responsibilities

Board has overall responsibility for this policy.

The Board delegate responsibility for this to the Audit & Risk Committee (ARC). ARC has responsibility for the following:

- Reviewing this policy to ensure its continued relevance and effectiveness.
- Making recommendations to the Board regarding financial crime risk management and related controls.
- Maintaining oversight of financial crime risk management and internal controls.
- Approving the annual financial crime workplan and reviewing progress.

Risk and Disclosure Committee (RDC) and Risk and Regulation Group (RRG) are responsible for the following:

- Reviewing periodic reports, financial crime related management information, and monitoring progress, as submitted by the Group Insurance and Financial Crime Manager.

The Group Insurance and Financial Crime Manager is responsible for:

- Overall responsibility for the coordination and execution of all anti-financial crime activities across the Group.
- Leading the delivery and communication of anti-money laundering activities in alignment with the financial crime framework.

- Providing regular reports, anti-money laundering related management information, and updates on progress against the financial crime framework.

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy.
- Demonstrate the Group's values and behaviours consistently in their day-to-day activities.
- Report immediately any suspicions or evidence of irregular, improper, or behaviours that indicate any form of financial crime.
- Exercise propriety and accountability in the use of the Group's resources, including the handling of funds and interactions with contractors, suppliers, and customers.

Policy content

What is money laundering

Money laundering is a term used to describe a scheme in which criminals try to disguise the identity, original ownership, and destination of money that they have obtained through criminal conduct. The laundering is done with the intention of making it seem that the proceeds have come from a legitimate source.

What is terrorist financing

Terrorist financing refers to the process of providing funds or financial support to individuals, groups, or organisations involved in terrorist activities. Unlike traditional money laundering, where illicit funds are integrated into the financial system, terrorist financing often involves clean money that is moved through seemingly legitimate channels to fund criminal activities. Identifying and preventing terrorist financing is a critical component of AML compliance.

The Group is committed to investigating all instances of actual, or suspected money laundering, and will take appropriate action to report, prevent and or recover any funds or assets lost as a result.

This policy reinforces the Group's zero-tolerance stance on anti-money laundering and terrorist financing and ensures that all colleagues understand their role in maintaining a transparent and trustworthy working environment.

Policy commitment

This policy underpins our commitment to ethical conduct and responsible governance by:

- Safeguarding colleagues, customers, third parties, assets, and resources from misuse or misappropriation.
- Promoting a culture of honesty, integrity, and accountability across all levels of the Group.

- Ensuring compliance with legal, regulatory, and contractual obligations, including reporting requirements to the National Crime Agency and regulatory reporting to His Majesty's Revenue and Customs.
- Supporting a consistent and initiative-taking approach to money laundering prevention, deterrence, detection, investigation and redress.

Examples of money laundering
The following is a non-exhaustive list of money laundering activities:

- Property Purchases: Criminals use illicit funds to acquire shared ownership properties, purchase outright sales properties, or settle arrears on rental accounts, effectively converting illegal proceeds into assets that appear legitimate.
- Property Misuse: Homes may be repurposed for criminal activities such as drug cultivation, human trafficking, or other illicit operations.

EIA statement

An Equality Impact Assessment was undertaken for this policy on 9 January 2026.

An Equality Impact Assessment (EIA) has been completed for this policy. The EIA ensures that the policy is fair, inclusive, and does not negatively impact any protected groups under the Equality Act 2010. The outcomes of the assessment will be monitored, and actions where needed to promote equity.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

Training statement

This policy will be trained out to all colleagues by e-learning to complete mandatory training every two years.

Measuring effectiveness

The effectiveness of this policy will be measured through self-assessment and independent scrutiny by periodic internal audit reviews and oversight by RRG, RDC, and ARC

Review period

This policy will be reviewed every three years by the Group Insurance and Financial Crime Manager, or sooner in response to significant regulatory or organisational changes. ARC approve this policy.

Supporting documents

This policy is supported by:

- Equality Impact Assessment

Version control

Version	Detail	Approved by	Date
1.0	New Bromford Flagship LiveWest policy	Audit and Risk Committee	February 2026
1.1	Policy template updated	n/a	September 2026
1.2	Amended Bromford Flagship Ltd to Bromford Flagship LiveWest Ltd on the titlepage	Approved by delegated authority	October 2026