

T3 Residential Limited

Anti-Money Laundering Policy

1 Introduction

- 1.1 T3 Residential Limited (“**T3 Residential**”) is committed to the highest ethical standards and good governance. It has a zero tolerance to all forms of fraud, bribery and corruption, including money laundering. The conduct of board members, staff, consultants, vendors and suppliers and others involved in delivering T3 Residential’s business is critical to achieving this.
- 1.2 Money laundering means exchanging money or assets that were obtained criminally for money or other assets that are ‘clean’. The ‘clean’ money or assets do not have an obvious link with any criminal activity. Money laundering also includes money used to fund terrorism, regardless of how it was obtained.
- 1.3 Effective use of systems and internal controls will assist with identifying how money laundering occurs. It also has benefits for communities, not only in the disruption of criminal activity, but helping to reduce related anti-social behaviour.
- 1.4 This policy applies to all board members, staff, vendors, and third parties acting on behalf of T3 Residential.
- 1.5 This policy covers all financial transactions, including payments, receipts, and procurement activities; and all business relationships, including those managed by our outsourced corporate services provider.

2 Legal and Regulatory Responsibilities (not exhaustive)

- 2.1 This policy is aligned with the following legislative and regulatory requirements:
- Proceeds of Crime Act 2002 (“**POCA**”);
 - Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 (“**MLR 2017**”);
 - Terrorism Act 2000;
 - Sanctions and Anti-Money Laundering Act 2018; and
 - Regulator of Social Housing’s Governance and Financial Viability Standard.

3 Policy Statement

- 3.1 ‘Money laundering’ is defined as the process by which criminally obtained money or assets are exchanged into something else to ‘clean’ them. This stops the money or asset being obviously connected with the crime from which they were generated. The ‘clean’ money is then fed back into the financial system so its original source is hidden.
- 3.2 T3 Residential adopts a zero-tolerance approach to money laundering and financial crime and will not accept any level of money laundering, irregularity, or corruption. Any case will be thoroughly investigated and dealt with appropriately. T3 Residential will maintain robust systems and controls to prevent, detect, and report suspected money laundering activities.
- 3.3 All employees, board members and third-parties working on our behalf must be aware of the actions required to prevent criminal activity through money laundering or similar impropriety and ensure all suspected cases are reported.

- 3.4 All employees should be vigilant and challenge unusual behaviours to help reduce the opportunity for criminal activity taking place through money laundering. This includes:
- Ensuring all tenants provide sufficient proof of their identity at first contact with T3 Residential (in line with our Tenancy Verification Policy);
 - Being vigilant in relation to transactions that carry a higher risk of money laundering;
 - Investigating unusual transactions; and
 - Reporting concerns.

- 3.5 This policy sets out the requirements that must be followed to ensure that T3 Residential complies with its legal and regulatory requirements.

4 Roles and Responsibilities

- 4.1 The board has ultimate accountability for anti-money laundering (“**AML**”) compliance. It is responsible for monitoring all reports of actual or suspected money laundering through the quarterly fraud report, and for commissioning special investigations into matters of concern relating to internal controls. The board is also responsible for notifying the Regulator of Social Housing of cases of significant money laundering, depending on the severity.
- 4.2 All staff, board members, and vendors must adhere to this policy, use financial systems responsibly, report any suspicious activity or concerns promptly, complete mandatory AML training, and protect the integrity of organisational assets.
- 4.3 Get Living London Limited (“**Get Living**”), as T3 Residential’s corporate services provider, is responsible for the day-to-day management of financial transactions and systems, implementing AML controls, and reporting on compliance. Get Living ensures that all staff and vendors under their management are trained and aware of their responsibilities.

5 Procedures

Risk Assessment and Controls

- 5.1 T3 Residential and its managing agent, Get Living, will conduct regular risk assessments to identify and mitigate money laundering risks across all rental activities. These assessments will consider factors such as the nature of transactions, geographic risks, and customer profiles. A risk-based approach ensures that resources are focused on higher-risk areas, such as unusual payment methods or tenants from high-risk jurisdictions.
- 5.2 Controls will include documented procedures for verifying identities (see our Tenancy Verification Policy), monitoring transactions, and escalating concerns. These controls will be reviewed periodically to ensure they remain effective and proportionate to the level of risk. Any changes in legislation or business operations will trigger an immediate review of risk controls.

Due Diligence

- 5.3 As per our Tenancy Verification Policy, T3 Residential will carry out identity verification checks on all adult tenants before entering into tenancy agreements. Staff will be trained to recognise situations requiring enhanced checks and to escalate concerns promptly. Where identity cannot be verified satisfactorily, the tenancy will not proceed, and the matter will be reported as appropriate.

Transaction Monitoring

- 5.4 All financial transactions, including rent payments and deposits, will be monitored for unusual patterns or behaviours. Indicators such as large cash payments, payments from third parties, or

transactions involving high-risk jurisdictions will trigger further investigation. Automated systems may be used to flag anomalies for review.

- 5.5 Monitoring will be ongoing throughout the tenancy, not limited to initial checks. Any irregularities identified during routine reviews will be escalated to management for assessment and, if necessary, reported to the relevant authorities. This proactive approach helps detect and prevent money laundering activities early.

Reporting Suspicious Activity

- 5.6 The following circumstances should raise suspicion of money laundering:
- The size of the transaction is not consistent with previous activity, or the financial circumstances of an existing customer have changed dramatically;
 - Money is paid by a third party who has no obvious link with the transaction;
 - The tenant wants to pay a large sum in cash;
 - A tenant puts pressure on you to accept their cash before you can carry out the necessary checks;
 - A tenant requests a refund under unusual circumstances; or
 - A significant build-up of credit balance on a tenant's account without a rational and clear reason.
- 5.7 Any staff member or individual working on our behalf who suspects money laundering or terrorist financing must report their concerns immediately to management. Reports should include all relevant details, such as the nature of the suspicion, parties involved, and supporting evidence.
- 5.8 Suspicious Activity Reports (“**SARs**”) will be submitted to the National Crime Agency (“**NCA**”) or other relevant authorities as required by law. T3 Residential will maintain a log of all SARs and ensure that reporting obligations are met promptly. Failure to report suspicions may result in disciplinary action and legal consequences.

Record-Keeping

- 5.9 Records of identity checks, sanctions screening, transaction monitoring, and SARs will be maintained in accordance with legal requirements. These records will be stored securely and retained for at least five years after the end of the tenancy, as required by MLR 2017. Access to these records will be restricted to authorised personnel only.
- 5.10 Proper record keeping ensures transparency and accountability in AML compliance. It also provides evidence of due diligence in the event of audits or investigations. T3 Residential will regularly review its record-keeping practices to ensure compliance with data protection laws and AML regulations.

Training and Awareness

- 5.11 All staff and relevant third parties will receive regular training on AML responsibilities, including how to identify suspicious activity, conduct due diligence, and report concerns. Training will be tailored to roles and updated to reflect changes in legislation or emerging risks.

6 Policy Review

- 6.1 The board is responsible for maintaining, implementing, monitoring, and evaluating this policy to ensure it remains current.

- 6.2 The policy will be reviewed every two years or more frequently as a result of an incident occurring, feedback obtained, internal/external audits and change in legislation or regulation. This process ensures the policy continues to be appropriate, adequate and effective.

7 Background Documents

- 7.1 This policy should be read in accordance with the following policy documents:
- Anti-Bribery Policy;
 - Anti-Fraud Policy;
 - Tenancy Verification Policy; and
 - Rent Collection and Arrears Policy.

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