

	Title	<h1 style="text-align: center;">Anti-money Laundering Policy</h1>		Document No.:	HR.POL.37
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It is the objective of Green Frog Utilities Ltd to ensure that it satisfies its duties under The Terrorism Act 2000, the Proceeds of Crime Act 2002 (POCA), and other pertinent legislation relevant to countering money laundering, the proceeds of crime, and corruption, and to remain bound by the laws of the UK.

Green Frog Utilities Ltd takes a zero-tolerance approach to money laundering and the proceeds of crime and is committed to acting professionally, fairly, and with integrity in all its business dealings and relationships wherever it operates. Where possible and reasonable, Green Frog Utilities Ltd takes steps to identify its customers and verify their identities by obtaining proof of identity and residential address.

There are three main pieces of legislation:

- Proceeds of Crime Act 2002 (POCA);
- Terrorism Act 2000; and
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 as amended by the Money Laundering and Terrorist Financing (Amendment) Regulations 2019.

What is Money Laundering?

Money laundering is the process by which criminally obtained money or other assets (criminal property) are exchanged for 'clean' money or other assets with no obvious link to their criminal origins. Criminal property may take any form, including cash or money's worth, securities, tangible property, and intangible property. It also covers money, however come by, which is used to fund terrorism.

Offences Include:

- Concealing, disguising, converting, transferring, or removing criminal property from England and Wales;
- Arranging, or becoming concerned in an arrangement, which the person who knows, or suspects, or facilitates (by whatever means), the acquisition, retention, use or control of criminal property by or on behalf of another person;
- Acquiring, using, or having possession of criminal property;
- Making a disclosure to a person which is likely to prejudice a money laundering investigation ("tipping off"); and
- Becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees, or any other retention or control of terrorist property.

This list is not intended to be exhaustive

Reporting Concerns

Green Frog Utilities Ltd encourages employees who are concerned about potential money laundering offences to report them internally to the Managing Director or via the Whistleblowing Policy. Green Frog Utilities Ltd has a zero-tolerance policy on the victimisation or harassment of whistle-blowers. If there are any doubts about a customer's identity, all dealings must stop with them until it is ascertained, and it must also be reported to the Managing/Operations Director immediately. If an employee fails to comply with the Anti-Money Laundering Policy, the Company may report this to the appropriate higher authority and/or take disciplinary action.



James Bourne – Director 8.12.25