



ANTI-MONEY LAUNDERING, COUNTER-TERRO RIST FINANCING AND SANCTIONS POLICY

UK Bailiff Services Ltd, trading as UK Bailiffs

A proportionate framework for preventing the misuse of our enforcement, recovery and property-support services for money laundering, terrorist financing, sanctions evasion or related financial crime.

Document owner	Director / appointed AML reporting lead
Version	2.0
Approved	September 2026
Review cycle	At least annually and after any material legal, operational or risk change
Applies to	Directors, employees, contracted enforcement agents, contractors and subcontractors acting for UK Bailiffs

Public policy copy. Operational reporting routes, decision logs and SAR material are restricted and are not included in this document.

1. Purpose and commitment

UK Bailiff Services Ltd is committed to conducting business lawfully and to preventing its services, accounts and payment processes from being used to handle criminal property, finance terrorism, evade sanctions or conceal the true purpose or beneficiary of a transaction.

We use a risk-based approach. Controls are proportionate to the instruction, the parties, the payment route and any warning signs identified. Suspicion is assessed on the facts available; staff and contractors are not expected to prove criminal conduct before raising a concern.

2. Regulatory position

Enforcement, process serving and property-support services are not automatically regulated-sector activities under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. Those Regulations apply by business type and activity. Where UK Bailiffs undertakes an activity that falls within the regulated sector, the applicable statutory requirements will be followed.

Irrespective of regulated-sector status, offences and obligations relating to criminal property, terrorist financing, sanctions and suspicious activity may apply. This policy therefore establishes proportionate controls across our operations.

3. Scope

- client onboarding and acceptance of instructions;
- commercial rent arrears recovery, enforcement, debt recovery and collection activity;
- lease forfeiture, possession, trespasser removal, process serving and related property services;
- receipt, allocation, transfer or refund of client, debtor or third-party funds;
- suppliers, contractors, agents, introducers and business partners; and
- records, reporting, training and management oversight.

4. Governance and responsibilities

The Board retains overall responsibility for this policy and for ensuring appropriate resources, authority and oversight. A Director or formally appointed AML reporting lead receives internal reports, decides whether escalation or external reporting is required and maintains restricted records.

Role	Core responsibility
Board / Director	Approve the framework, review material risks and ensure remedial action.
AML reporting lead	Receive concerns, assess suspicion, obtain advice where necessary, consider SAR and defence-against-money-laundering requirements, and protect confidentiality.
Managers	Apply onboarding, payment and operational controls; escalate exceptions promptly.
Staff and contractors	Remain alert, follow controls, preserve records and report concerns without tipping off any person.

5. Business-wide risk assessment

UK Bailiffs periodically assesses the exposure created by its services, clients, counterparties, delivery methods, geography and payment arrangements. The assessment is reviewed after material changes, identified control failures or relevant legal developments.

- the legal identity, ownership and authority of the instructing party;
- whether the purpose and commercial rationale of the instruction are clear;
- the service type, anticipated value, urgency and use of intermediaries;
- connections to sanctioned persons, high-risk jurisdictions or opaque ownership structures;
- cash, third-party payments, overpayments, refunds or unusual payment routing; and
- adverse information, inconsistent documents, resistance to checks or unexplained changes.

6. Client and instruction checks

Before accepting an instruction, UK Bailiffs obtains enough information to understand who is instructing, their authority, the service requested and the apparent lawful basis. The depth of checking increases with risk.

- Individuals: name, contact details and, where proportionate, reliable identity and address evidence.
- Companies and organisations: legal name, registered number or equivalent, registered or principal address, instructing contact and authority.
- Ownership and control: beneficial ownership or control is considered where ownership is material, unclear, unusually complex or presents higher risk.
- Instruction: relevant lease, order, warrant, contract, notice, land interest or other authority is reviewed as appropriate to the service.
- Purpose and funds: the commercial rationale and expected payment route must be consistent with the instruction. Source-of-funds or source-of-wealth information may be requested where risk warrants it.

When checks cannot be completed

The instruction may be paused, declined or terminated. No person should be told that a report has been or may be made where doing so could amount to tipping off or prejudice an investigation.

7. Enhanced measures

Enhanced checks and senior approval may be required where risk is elevated. Measures may include obtaining additional independent documents, clarifying ownership, verifying authority directly, reviewing adverse information, establishing source of funds, screening relevant parties and applying closer transaction monitoring.

8. Payment and refund controls

- Funds are accepted only where connected to a genuine UK Bailiffs instruction or lawful business transaction.
- Receipts are recorded and reconciled to the correct case, client and payer.
- Unexplained third-party payments, fragmented payments, substantial cash, overpayments and requests to redirect refunds are escalated.
- A refund should normally return to the original payer through the original payment route. Exceptions require verification, a recorded reason and approval.
- UK Bailiffs will not knowingly receive, transfer or refund money to disguise ownership, origin, destination or purpose.
- Agents and contractors must not use personal accounts to receive or route case funds unless expressly authorised under an approved documented arrangement.

9. Warning signs

Client or instruction	Payment or behaviour
Identity, ownership or authority cannot be verified; documents conflict; an unnecessary intermediary is used; the instruction lacks a credible lawful or commercial purpose.	Payment from an unrelated party; unexplained cash; deliberate splitting; overpayment followed by refund elsewhere; urgency or secrecy without a reasonable explanation.
Links to sanctions, serious crime, fraud, corruption or high-risk jurisdictions; unusual resistance to routine questions.	Payment pattern does not match the case; bank details change unexpectedly; a person asks UK Bailiffs to hold or pass funds unrelated to the instruction.

A red flag is not proof of wrongdoing. It is a reason to stop, check, document and escalate.

10. Internal reporting and suspicious activity

Anyone acting for UK Bailiffs who knows or suspects money laundering, terrorist financing, sanctions evasion or handling of criminal property must report the facts promptly through the designated internal route. The report should record what happened, the parties, relevant dates and payments, and why the circumstances appear unusual.

The AML reporting lead assesses the information and decides whether legal advice, a Suspicious Activity Report to the National Crime Agency, a request for a defence against money laundering, an OFSI report or another lawful notification is required. Operational activity may be paused or controlled while that assessment is made.

Information about an internal report, SAR or investigation is restricted. No one may alert the subject or act in a way likely to prejudice an investigation.

11. Sanctions

UK Bailiffs complies with applicable UK financial sanctions. Relevant clients, counterparties, beneficial owners, payers and recipients may be checked against the UK Sanctions List where required by law or indicated by risk. Potential matches, frozen-asset concerns and suspected breaches are escalated immediately and no prohibited dealing is undertaken.

12. Agents, contractors and suppliers

Contracts and instructions may require compliance with this policy and cooperation with reasonable checks. UK Bailiffs may verify certification, identity, insurance, business details, bank ownership and authority. Material concerns, refusal to cooperate or misuse of funds may lead to suspension, termination and external reporting where required.

13. Training and awareness

Relevant personnel receive proportionate information or training for their role. This covers warning signs, payment controls, internal reporting, confidentiality and the prohibition on tipping off. Completion and material updates are recorded.

14. Records and data protection

UK Bailiffs keeps proportionate records of checks, risk decisions, approvals, transactions, internal reports and training. Where the Money Laundering Regulations apply, relevant records are retained for the statutory period, normally five years. Other records are retained under the company's retention schedule and applicable legal requirements.

Personal data is processed only where there is a lawful basis and is protected by appropriate access, security and confidentiality controls. SARs and related material are held separately with tightly restricted access.

15. Breaches and non-retaliation

Failure to follow this policy may result in removal from an instruction, suspension of access, contractual action or disciplinary action. UK Bailiffs will not tolerate retaliation against anyone who raises a genuine concern in good faith.

16. Monitoring and review

The policy and supporting controls are reviewed at least annually and after material regulatory, service or risk changes. Reviews consider incidents, internal reports, payment exceptions, training, audit findings and lessons learned. Changes are approved by the Board or an authorised Director.

17. Key legal and official references

- Proceeds of Crime Act 2002.
- Terrorism Act 2000.
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, as amended, where applicable.
- Criminal Finances Act 2017.
- Sanctions and Anti-Money Laundering Act 2018 and regulations made under it.
- National Crime Agency guidance on Suspicious Activity Reports.
- Office of Financial Sanctions Implementation guidance and the UK Sanctions List.
- UK GDPR and Data Protection Act 2018.

This policy describes UK Bailiffs' control framework. It does not create a representation that every UK Bailiffs activity falls within the regulated sector under the 2017 Regulations, and it does not replace case-specific legal advice.