



A Nominated Officer's Guide to iamproperty movebutler and **AML Compliance.**

Introduction

The latest Money Laundering Directives have made regulations in the property industry more stringent than ever, and Estate Agents have a legal obligation to carry out effective client identification and anti-money laundering (AML) checks.

iamproperty movebutler's comprehensive online compliance module was developed to help protect your agency from risk. Comply with the latest AML and CPR regulations through efficient online checks, providing the security and assurance your agency needs to onboard new clients with confidence.

Already used and trusted by over 900 Estate Agents, movebutler takes the stress out of AML, helping to save time without compromising on compliance.

This guide has been created to help Nominated Money Laundering Officers by highlighting key responsibilities and the many ways in which movebutler can help you to fulfil these obligations, quickly and easily.

Disclaimer: Guidance provided is not advisory, but for information purposes only.



Did you know, 28% of Estate Agents don't have an appointed MLO? Yet it's a primary requirement of HMRC Anti-Money Laundering regulations!*

*iamproperty research

How does movebutler support Nominated Money Laundering Officers?

As your business's Nominated Officer, we understand that you have a lot on your plate! The administrative burden of AML compliance can be time consuming, but with the risk of HMRC audits, it's important to dot the i's and cross the t's.

movebutler is designed to support you in your role by providing:

- A comprehensive system that allows Risk Assessments, ID checks and customer due diligence to be carried out for all parties quickly and easily.
- Easy to follow guidance and tasks for branch staff, for improved day-to-day compliance.
- Reporting dashboards so you can see outstanding tasks and business risk at a glance.
- Automatic high risk transaction alerts sent directly to you for appropriate action.
- Automatic updates to the system in line with legislative changes.
- Training content and certification so it's easy to fulfil annual AML staff training obligations.
- Land registry integration for easy beneficial owner identification.
- All documentation in one, easily accessible place for 5 years (in line with HMRC requirements).

Did you know? iamproperty movebutler has helped Estate Agents complete over 100,000 Risk Assessments?

How iamproperty movebutler helps

Legislation can be a bit of a mine field, and it's not always clear what is expected. In fact, in a recent survey carried out by **iamproperty**, only 29% of Estate Agents felt HMRC Anti-Money Laundering (AML) regulations were "very clear" with 50% agreeing they were "somewhat clear".

Use this as a quick reference guide to how iamproperty movebutler helps with the key HMRC requirements:

HMRC Guidance	Key actions to take:	How iamproperty movebutler can help
Have a policy, controls and procedures document in place.	Prepare, maintain and approve a written policy statement, controls and procedures to show how the business will manage the risks of money laundering and terrorist financing identified in risk assessments.	Download an AML policy template directly from the movebutler dashboard and personalise for your business. Use the movebutler compliance help centre to access helpful links to HMRC guidance.
Appoint a Nominated Officer to handle all money laundering suspicions. Larger agencies should also appoint a deputy Nominated Officer.	Appoint a Nominated Officer – this should be at an appropriate level of seniority in your business to make decisions on transactions. Ensure all staff know the name of the nominated officer and any deputy.	You can add your MLO details to movebutler so staff can easily contact you, and high risk alerts are sent to you automatically.
Agencies with more than one branch should appoint a Compliance Officer responsible for ensuring the business takes the correct steps to ensure compliance with the legislation and HMRC requirements.	Inform HMRC of the names of the nominated officers within 14 days of the appointment and if there is a change in the post holder.	Use the movebutler compliance help centre to access helpful links to HMRC guidance.
All staff must be trained to ensure they are aware of the risks of money laundering and terrorist financing, relevant legislation and obligations, know who the nominated officer is and what their responsibilities are. Plus, staff must understand the firm's procedures and be able to recognise and deal with potential money laundering or terrorist financing suspicions.	Provide regular formal training to staff and keep a record of this training. Annual training will meet the requirement for 'regular' training.	Training videos and option for Annual AML certification with multiple choice test for all agency staff and automatic reminders for renewal. Note: You will still need to ensure all staff are aware of your specific business procedures and processes.
You must identify the existence of ALL property owners and any other beneficial owners.	Beneficial owners are individuals who ultimately own or control the property, or on whose behalf a transaction or activity takes place	Land Registry integration; quickly download Title documents to obtain proof of ownership and listed beneficial owners.
Assess the risk of involvement in money laundering of all sellers, beneficial owners and buyers. Beneficial owners are not just those on the title register. Significant controllers in a business are also beneficial owners.	Carry out a risk assessment on each party involved in a transaction to identify the level of risk and keep a record of that assessment.	With movebutler you can quickly complete risk assessment questions and the system identifies the level of risk or if you have digital customer onboarding activated, the customer completes a questionnaire and results can be seen in your dashboard for review.

HMRC Guidance	Key actions to take:	How iamproperty movebutler can help
Consider the level of identification, verification and ongoing monitoring that is needed depending on the risks you assessed. You must be able to show that the extent of these procedures is appropriate when asked to do so.	The steps you take will vary depending on the level of risk an individual poses. The higher the risk, the more steps you should take.	iamproperty movebutler provides guidance on the different routes you can take based on the level of risk identified – taking out any guess work
Complete customer due diligence on all customers and beneficial owners before entering into a business relationship. Plus complete customer due diligence on the buyers prior to exchange of contracts.	You should follow any and all steps within the guidance to complete due diligence, movebutler will indicate that steps have been completed, and if any other considerations should be made. movebutler allows you to easily review and amend the risk assessment responses when you become aware of a change in circumstance and will update the risk level to reflect this; you will be provided with guidance as to whether additional due diligence is then required. It is always recommended that you ensure that the client and transaction circumstances are consistent with the information you hold.	A fully auditable transaction summary is kept, showing all actions taken against a transaction.
Enhanced customer due diligence will be required for individuals that fall into the high risk category.	Complete Enhanced Customer Due Diligence (ECDD) by carrying out extra checks on the customers ID.	movebutler's Risk Assessment helps to identify high risk individuals and provides you with various levels of ID checks and searches to complete the necessary enhanced customer due diligence and flags any outstanding tasks.
Identify politically exposed persons (PEP), their family members and close associates and verify their identity, source of wealth and/or funds. In such cases the Nominated Officer should be informed and take appropriate steps to monitor the transaction more closely than normal.	Steps should be taken to ascertain whether or not the individual is a PEP, family member or close associate which can be difficult.	movebutler allows you to carry out a PEP check and the system will flag any match to alert staff when an individual may be politically exposed. As a higher risk transaction the MLO will be automatically alerted by the movebutler system.
Establish whether an individual is named on the HM Treasury Financial Sanctions list. Take appropriate steps to apply to the Treasury where an individual is on the list.	Check ID against Financial Sanction Lists.	movebutler allows you to carry out Sanction checks. This checks numerous Global sanctions lists (Full details can be found in the Appendix on pg. 15).
Records of each required process must be held, either in paper copy or in digital format by you or any third party provider of services you use.	Keep detailed records of steps and action taken on each transaction.	The online, digital system is fully auditable with a record of all actions taken by staff within the movebutler dashboard. Clearly evidence necessary actions taken and any associated documentation to HMRC.
All transaction records must be held for 5 years from the date the business relationship ends.	Keep detailed records of steps and action taken on each transaction.	movebutler provides secure document storage.

Our partnership with CREDAS

iamproperty has partnered with CREDAS to provide a market-leading compliance solution, designed to meet the specific needs of Estate Agents and property professionals.

Our iamproperty movebutler module uses CREDAS technology to power ID checks and Customer Due Diligence tools, that ensure our Estate Agent Partners can fulfil their AML compliance obligations with ease, whilst providing an unrivalled client experience.

Our quick and secure solution provides cutting edge real-time ID document scanning and chip reading, combined with identity and facial recognition technology, making it the perfect choice for forward thinking Estate Agents.

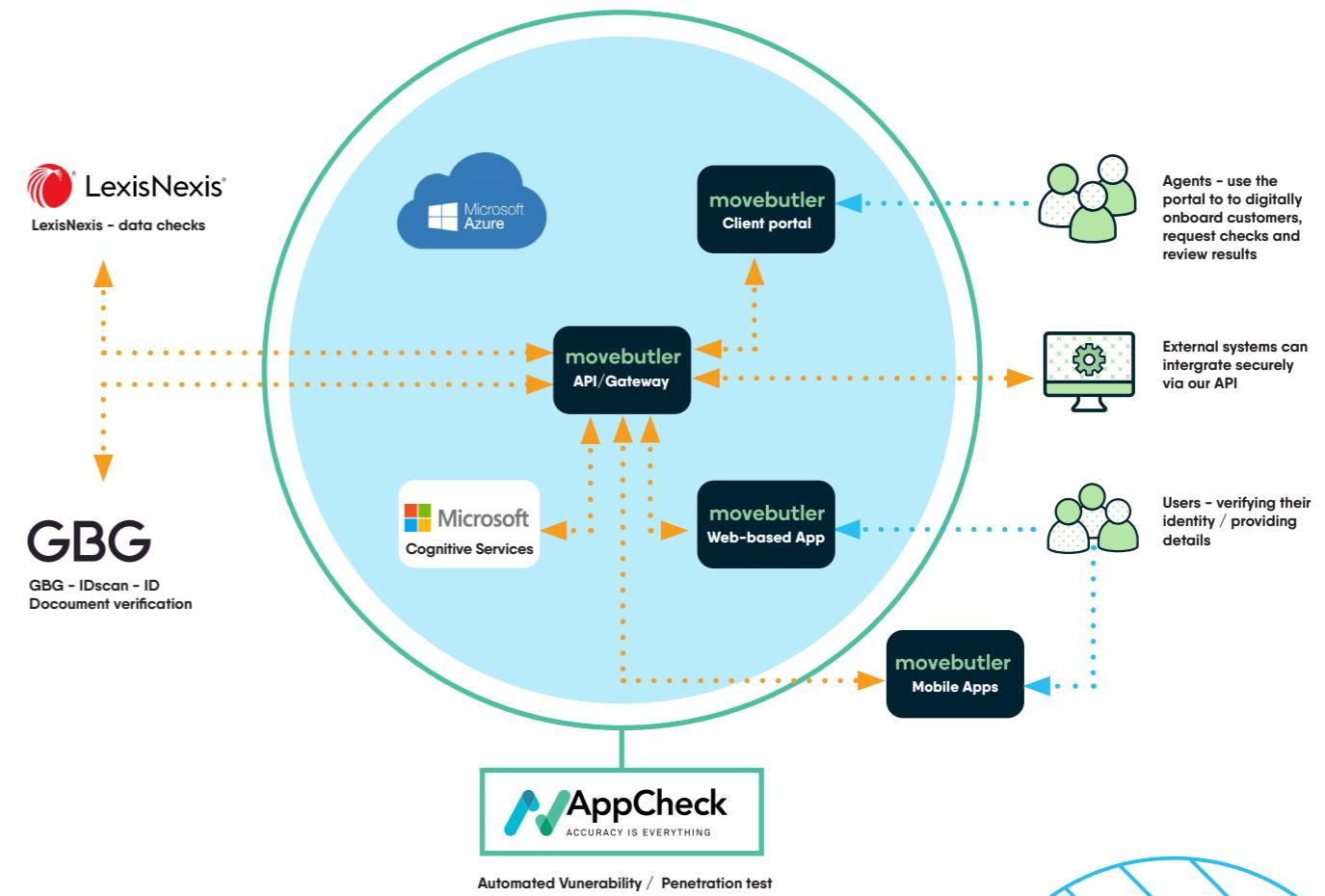
Why CREDAS

- Verify up to 4,000 types of ID
- Industry leading accuracy: Up to 97.7% facial recognition accuracy
- 100% NFC chip accuracy
- Data stored in highly secure cloud, ensuring full GDPR compliance

CREDAS Architecture and service providers

Solution Overview

Credas is cloud-based (Microsoft Azure). There are a number of components to the solution, and they integrate with three key providers – GBG, LexisNexis and Microsoft.



Key things you need to do:

Actions to take when you are appointed:

1. Ensure that HMRC are informed of your appointment through the Government Gateway portal on your AML registration page.
2. Ensure that all your staff are informed of your appointment and how they can contact you if they need to report any suspicions of money laundering.
3. Register yourself on the National Crime Agency (NCA) website. This will allow you to make a Suspicious Activity Report (SAR) quickly and easily.

What to do when a member of staff reports a suspicious activity to you?

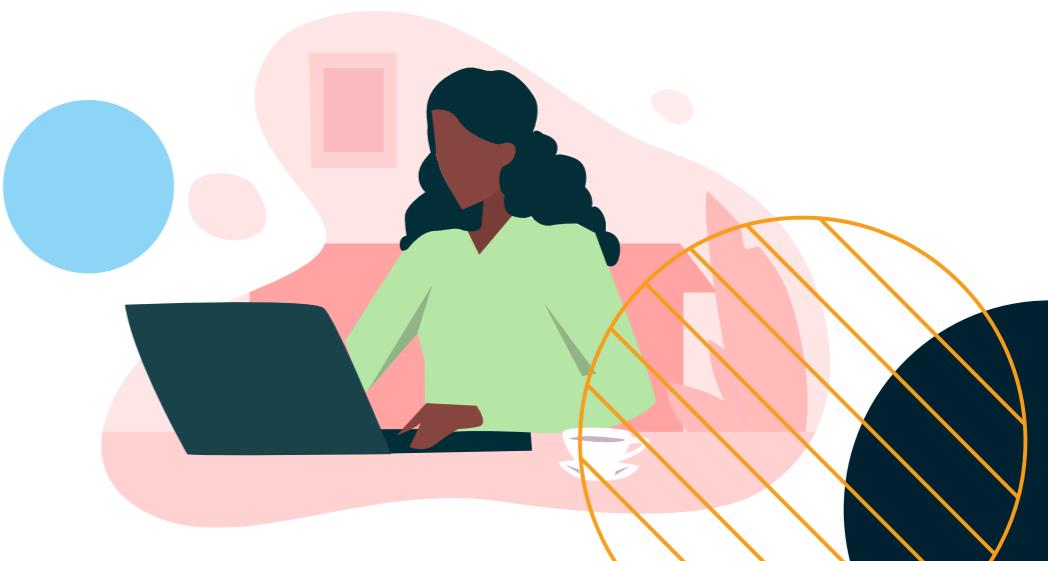
1. Consider all the facts and suspicions and decide whether a SAR should be made to the NCA. There is a link to the SAR website on the left-hand side of the movebutler dashboard. If you are actively involved with the person/transaction you should consider clicking the “CONSENT” tick box when making the SAR.
2. If you click “COSENT” you should await NCA approval to continue with your involvement in the transaction. In the unlikely event that you are not contacted by the NCA you are given ‘deemed’ consent after 7 working days from the date the report is made.
3. If you decide that a SAR is not appropriate as there is no suspicion of money laundering activity you should make clear notes on the reasoning behind your decision and retain that on file, which you can do by adding notes to the transaction in the dashboard.

What to do when the risk assessment indicates the person is high-risk?

1. Contrary to popular belief you **can** continue to deal with the person/transaction.
2. The high-risk assessment result means that you need to take additional steps to confirm their identity, because if a person is at a high-risk of money laundering there is a greater risk they will attempt to hide or disguise their identity.
3. A member of your staff should monitor the transaction more closely than you would a normal transaction for any signs of potential money laundering.
4. There is no requirement to make a SAR because of this assessment, but if any actual money laundering is suspected then a SAR should be made.

What to do when a Politically Exposed Person (PEP) is indicated in an report?

1. The report will simply indicate that there is a possibility that the person is a PEP, usually due to a name match.
2. This does not mean they are the PEP but it is still your responsibility to confirm their actual position.
3. Depending on the situation you might consider taking some simple steps to do this, such as:
 - Comparing dates of birth to see if there is a match;
 - Googling the PEP so that you can obtain an image of them and comparing that to your client’s image;
 - Asking your client directly if they are a PEP.
4. HMRC categorise a PEP as someone who is potentially a higher risk of being involved in money laundering.
5. Contrary to popular belief you **can** continue to deal with a person who is a PEP.
6. If you are unable to confirm whether the person is a PEP you should treat them as a PEP and follow the guidance for high-risk individuals.
7. Where a person is a PEP, or deemed to be a PEP you need to take additional steps to confirm their identity, because if a person is a high-risk of money laundering there is a greater risk they will attempt to hide or disguise their identity.
8. You or a member of your staff should monitor the transaction more closely than you would a normal transaction for any signs of potential money laundering. There is no requirement to make a SAR because of this assessment, but if any actual money laundering is suspected then a SAR should be made.





HMRC Audits.

What to expect?

HMRC actively carry out telephone and personal visit audits on Estate Agents. Penalties can be issued if an agent fails the audit.

Telephone Audits

1. You will receive a phone call from the officer conducting the audit and a convenient time to carry out the telephone audit will be arranged.
2. The officer will ask a variety of questions relating to the set up and operation of the business.
3. The answers you provide will be compared to the information they hold on the company in the AML registration section of your Government Gateway account. Any discrepancies may result in a penalty.
4. You will then be asked questions relating to your internal policies, controls and procedures and will potentially be asked to send documents.
5. You may be asked about the training you have provided to your staff and your registration with the NCA and about any SARs you may have made.
6. Depending on the findings, penalties may be imposed and/or a personal visit audit may be arranged.

Personal Visit Audits

This will follow the same process as the telephone audit in the initial stages.

1. During the visit the officer will then want to examine and review your Policy, Controls and procedures documentation to ensure that it meets the requirements of HMRC and that it meets the basic requirements set out within the online HMRC guidance document. Breaches may result in a penalty.
2. They will then ask for a sample of property files to review.
3. They will compare the contents to your policy document to ensure you are following your own documented processes and that you have taken all the required steps on –
 - Identifying owners.
 - Risk assessing clients, sellers and buyers.
 - Conducting appropriate customer due diligence (CDD).
 - Obtaining the buyer's proof of funds, which is required so that you can assess whether there is any risk of money laundering by the buyer.
4. Once completed the officer will send you a report on what took place and you will be able to respond if you feel it does not reflect the actual process.
5. The officer will then produce a report of their findings, which may include –
 - Advice on improvements to be made.
 - Warnings about breaches.
 - Penalty details, if appropriate.
6. You will be able to respond and object to the content of the report or any penalty.
7. Subsequently, a final response and penalty notification will be sent out.
8. You will have the opportunity to appeal against the response and penalty notification.

Risk Assessments explained

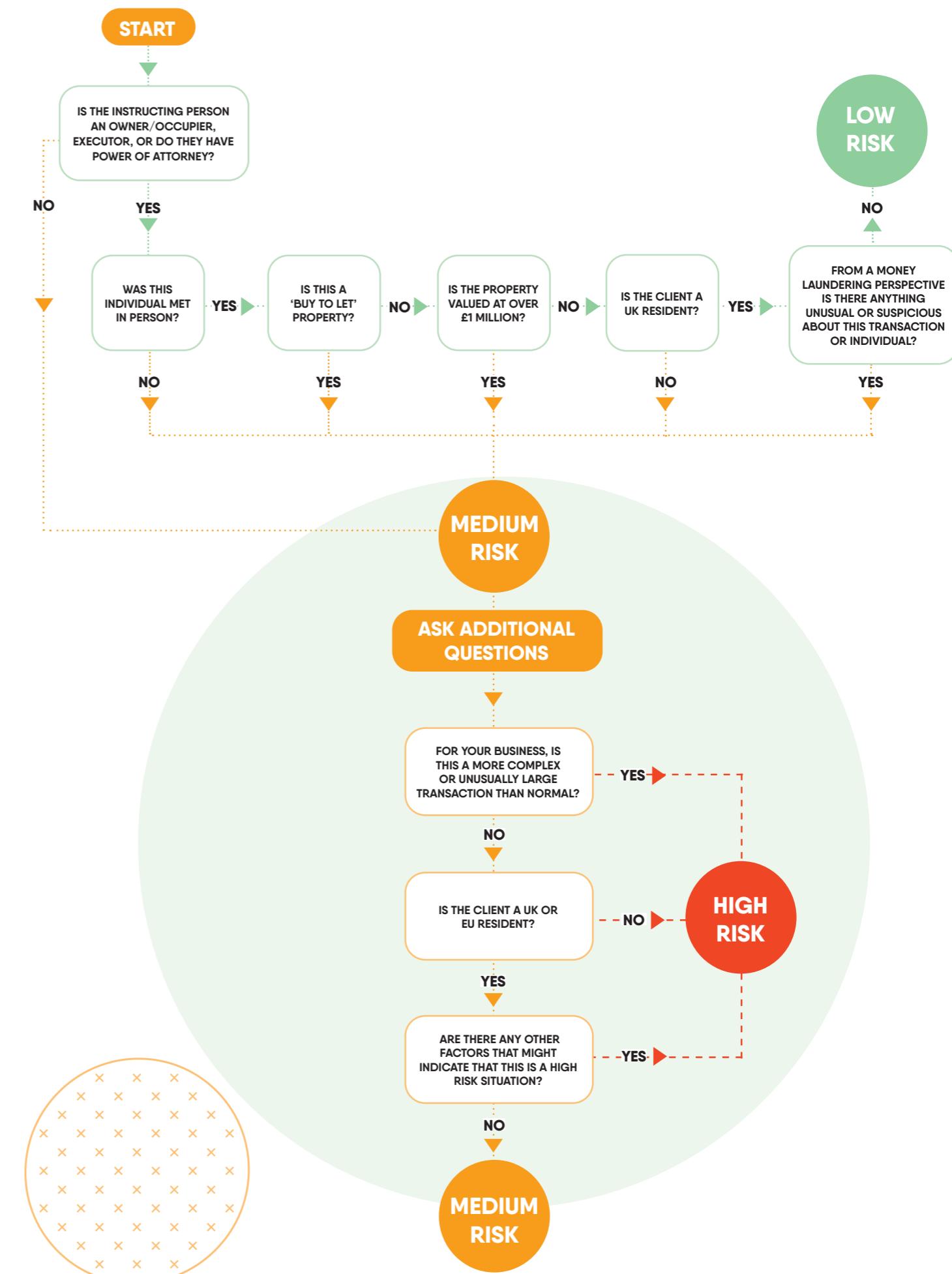
As part of HMRC guidance, you must take a risk-based approach to all transactions and carry out a Risk Assessment on all vendors and buyers.

movebutler supports your agency to fulfill this requirement by including Risk Assessments in the process for onboarding clients; whether this is done by the branch staff manually, or via the digital customer onboarding tool which help saves staff time.

HMRC will expect you to know and understand the process used by movebutler to assess and identify the level of risk for each client. You should familiarise yourself with each of the Risk Assessment processes detailed below.

How the risk level is calculated for Vendors

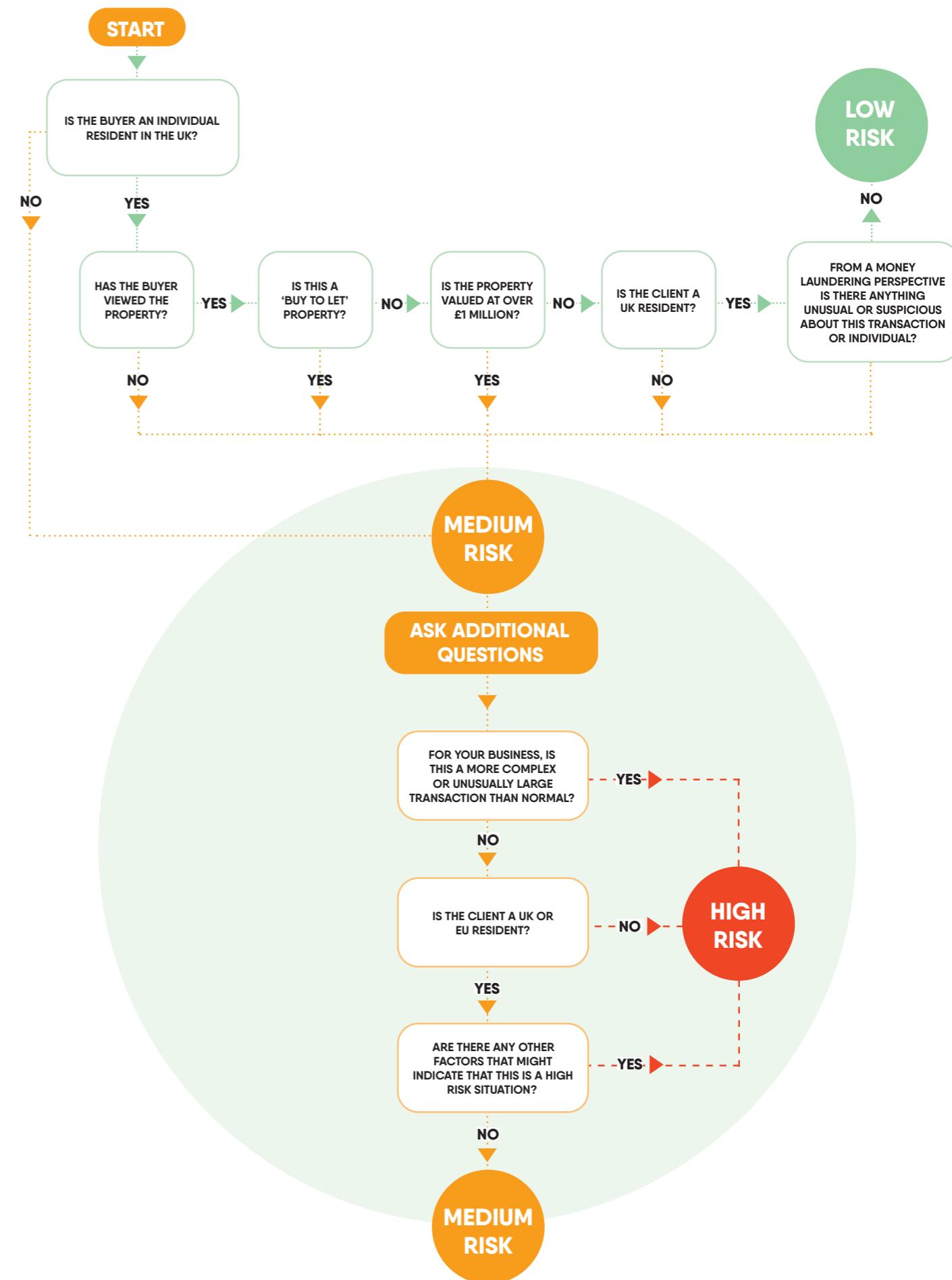
Question	Why we ask
Is the instructing person an owner/occupier/executor, or do they have Power of Attorney?	HMRC require Agents to obtain evidence of legal right to sell. movebutler also allows you to check Title documents for Legal Owner Information.
Was this individual met in person?	Meeting an individual in person is naturally less risky than not, as you can check they are a true likeness to any ID and interpret behaviour and body language. movebutler's biometric ID verification includes a "liveness" check so remote ID provision is still robust.
Is this a 'buy to let' property?	Individuals can put in tenants to try and distance themselves from ownership, which can indicate illegal activities and therefore higher risk.
Is the property valued at over £1 million?	Higher value transactions naturally create greater levels of risk for your business, should any illegal activity take place.
Is the client a UK resident?	A UK resident, purchasing a UK property isn't likely to indicate higher risk, but someone residing outside of the UK, buying in the country could.
From a money laundering perspective is there anything unusual or suspicious about this transaction or individual?	There may be other indicators (not specifically covered by the other set questions) that suggest suspicious activity/behaviour - it is important to consider these.
Has the property been owned for 12 months or more?	Property changing hands quickly can be an indicator of Money Laundering activity, so there is a higher level of risk associated.
For your business, is this a more complex or unusually large transaction than normal?	Criminals may target smaller branches or businesses in the hope that checks are less robust and their activity can slip under the radar.
Is the client a UK or EU resident?	If someone is selling a property in the UK but does not live here, this could indicate a higher level of risk.
Are there any other factors that might indicate that this is a high risk situation?	The questions asked may not be exhaustive, staff may wish to provide additional information - this is automatically added to the property record.



Risk Assessments explained

How the risk level is calculated for Buyers.

Question	Why we ask
Is the buyer an individual resident in the UK?	A UK resident, purchasing a UK property isn't likely to indicate higher risk, but someone residing outside of the UK, buying in the country could.
Has the buyer viewed the property?	Legitimate Buyers purchasing a property are more likely to view the property in person.
Is this a 'buy to let' property?	Individuals can put in tenants to try and distance themselves from ownership, which can indicate illegal activities and therefore higher risk.
Is the property valued at over £1 million?	Higher value transactions, naturally create greater levels of risk for your business, should any illegal activity take place.
Is the client a UK resident?	If someone is buying a property in the UK but does not live here, this could indicate a higher level of risk.
From a money laundering perspective is there anything unusual or suspicious about this transaction or individual?	There may be other indicators (not specifically covered by the other set questions) that suggest suspicious activity/behaviour - it is important to consider these.
For your business, is this a more complex or unusually large transaction than normal?	Criminals may target smaller branches or businesses in the hope that checks are less robust and their activity can slip under the radar.
Is the client a UK or EU resident?	If someone is buying a property in the UK but does not live here, this could indicate a higher level of risk.
Are there any other factors that might indicate that this is a high risk situation?	The questions asked may not be exhaustive, staff may wish to provide additional information - this is automatically added to the property record.



Where digital customer onboarding is used the client provides responses to questions which can help ascertain level of risk, these are then shown in your agent dashboard automatically.

Digital Client ID Verification

Designed to be secure, quick and easy to use.

Hi Deb

Please complete each section below for the sale of: **I AM Sold Ltd, Arden House, NE3 3LU** or email movebutlerenquiries@iamproperty.com

[Save progress and log out](#)

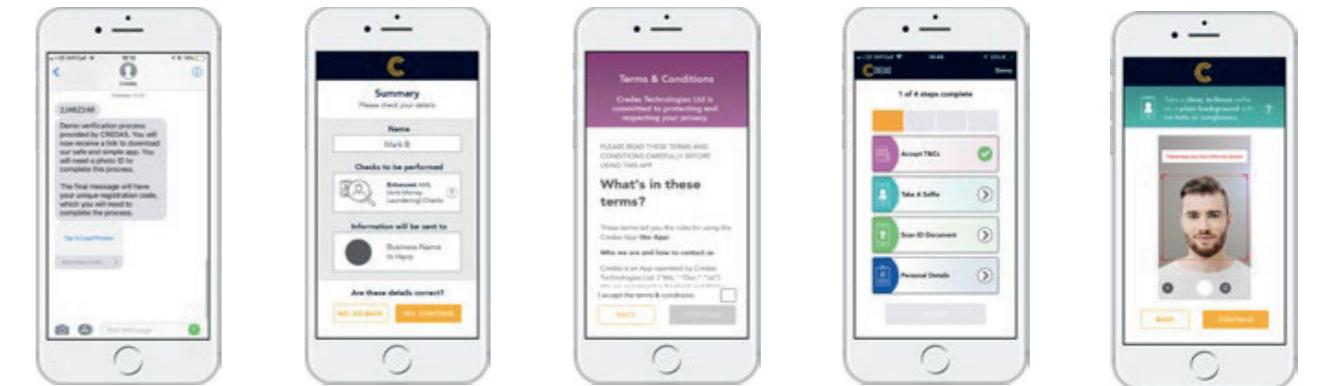
Need any help?
Call us on [0191 271 82 66](tel:01912718266)

Compliance and ID

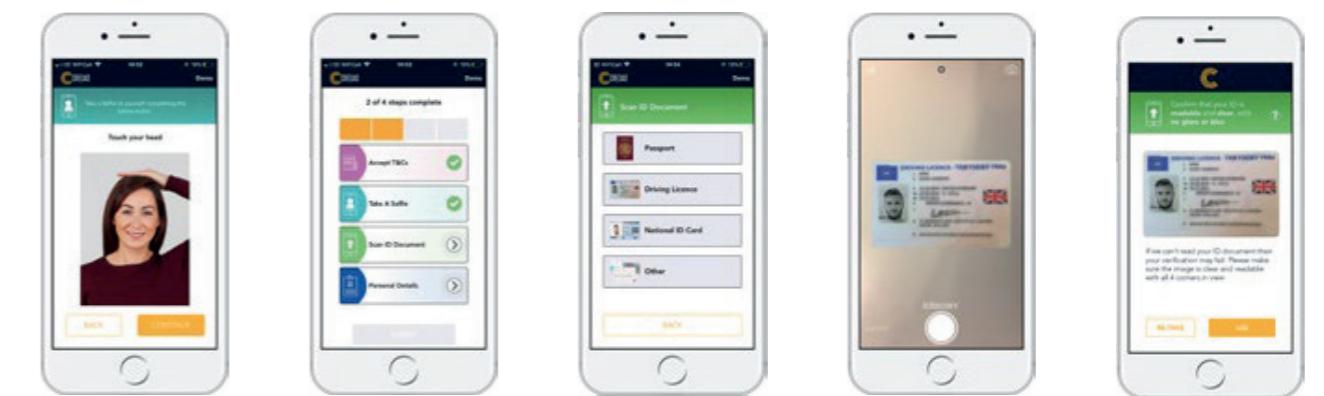
Is the instructing person an owner/occupier, executor, or do they have Power of Attorney?	Yes	No
Did you meet your estate agent in person?	Yes	No
Is this a 'buy to let' property?	Yes	No
Is the property valued at over £1 million?	Yes	No
Do you believe yourself to be a politically exposed person? <small>In line with HMRC guidelines, we will run an automatic check to determine this in the following screen.</small>	Yes	No
Are you a UK resident?	Yes	No
Has the property been owned for 12 months or more?	Yes	No

[Submit questionnaire](#)

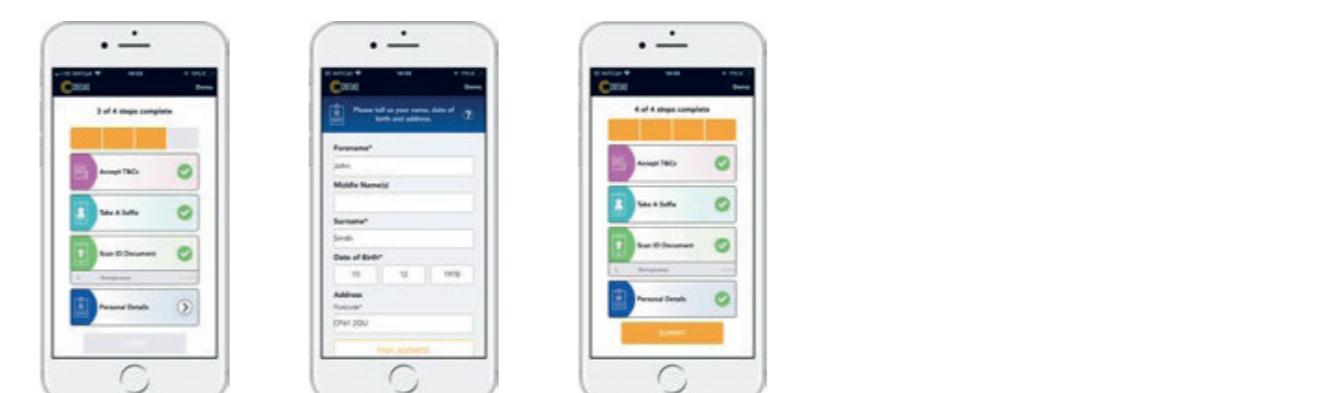
- 1** Receive an invite via email or SMS
- 2** Check the details
- 3** Read & accept T&Cs
- 4** Select take a Selfie
- 5** Take a selfie



- 6** Copy the action
- 7** Select scan ID
- 8** Select ID document
- 9** Scan ID document
- 10** Check the scan is clear



- 11** Select personal details
- 12** Enter personal details
- 13** Click submit to finish



There are some questions that we are unable to ask the client, so these are still posed to the agency branch staff carrying out onboarding.

Dashboard - iamproperty

movebutler

iamsold

Biometric Online ID Verification

Save

Due diligence requires approval

Please review the client's risk assessment and Biometric online ID verification results. To ensure full compliance with your AML obligations, please ensure you have investigated any alerts/fails/refer and obtained additional information/documentation if required.

Please review your initial assessment to confirm approval

From a money laundering perspective is there anything unusual or suspicious about this transaction or individual?	Yes	No
-------------------------------------------------------------------------------------------------------------------	-----	----

[Submit](#)

iamproperty movebutler

types of ID check

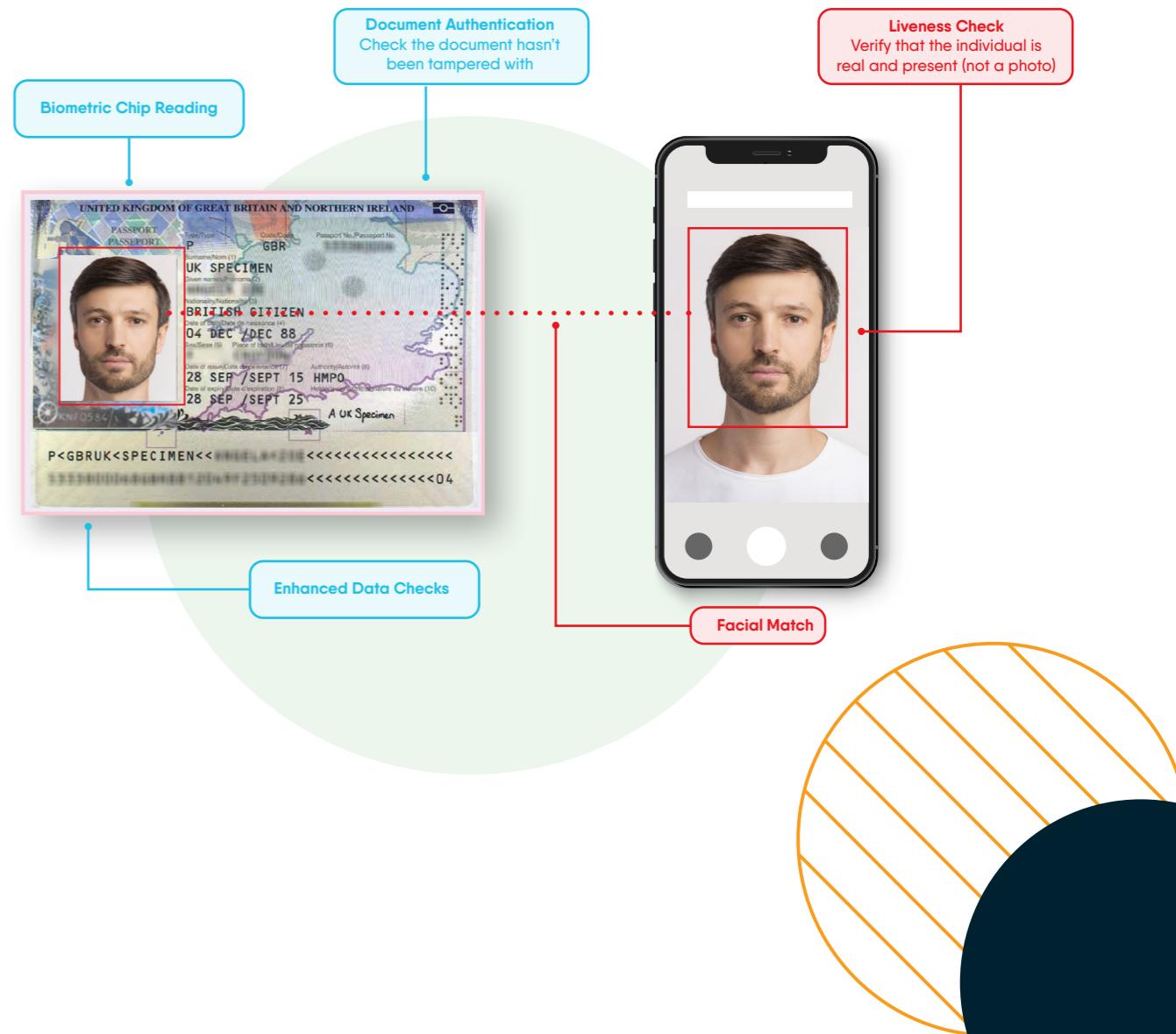
Type of Check	How it works	Why use it
PEP & Sanction	Provides authentication against Politically Exposed Persons lists from across the World. This includes family of Politically Exposed Persons and provides authentication against multiple sanctions and enforcement lists across the world.	A PEP or Politically Exposed Person is typically someone who is a prominent public figure. PEPs present a higher risk of bribery as they could be corrupted or their influence taken advantage of. It does not just include the person themselves but can also include family members, or close business associates. Identifying someone as a PEP doesn't mean that you shouldn't do business with them, it just means you need to be careful and must perform enhanced due diligence checks (EDD), and prove you have carried out the PEP screening.
Full Electronic Confirmation	This is a combination of standard and enhanced AML – a combination of PEP and sanctions, address and Electoral Roll (Provides checking of address and date of birth against the Electoral Roll), DOB, mortality (Checks the UK deceased database. Provides checking of a first and last name at an address against the registered deceased persons database), and credit checks.	Carrying out additional checks is necessary when an individual has been identified as a medium or high risk, to ensure you have verified their ID. Mortality and address checks ensure the ID being used has not been stolen from someone who may be deceased or residing at another address
Biometric Identity verification	We use biometric facial recognition technology to verify a person's identity anytime, anywhere – using a selfie as a reference point, and a unique action protocol to ensure the customer is real and present at the point of verification.	This is not only a robust way to check someone's identity but it can also be useful in instances where it may be difficult to meet the client in person, or to reduce the need for clients to travel to the branch to provide documents which can be more convenient. Because a liveness check is used, you can ensure the person providing the documentation is the same as the person featured in the ID eg. they aren't using someone else's.
Cryptographic COMING SOON	100% accuracy using NFC passport chip technology with real-time results.	This check utilises NFC reading technology to read the RFID chip embedded in passports. This is the most reliable and secure method to determine whether it is a genuine government issued document. It ensures the document being used is a genuine document that has not been forged and is in date. When coupled with a liveness check it is a very robust way to ensure the person presenting the information matches the photo on the ID document.
Traditional Documentation	As an Agent you can scan and upload copies of documents that have been viewed in person with a client in branch.	This can be helpful for clients who cannot use customer onboarding, or if you prefer to meet your client in person to verify identity.

NFC reading Technology

It is important to find out if the person you are representing is who they say they are and you can do this by using a form of evidence that can be checked by interrogating cryptographic security features.

Security features must include an electronically held photo of the identity against which biometric facial recognition checks may be made e.g.

- Biometric passports that meet the ICAO specifications for e-passports.
- Identity cards from an EU or EEA country.
- UK biometric residence permit.



How do we do this?

Our system utilises NFC reading technology to read the RFID chip embedded in passports to ensure it is a genuine document that has not been forged and is in date.

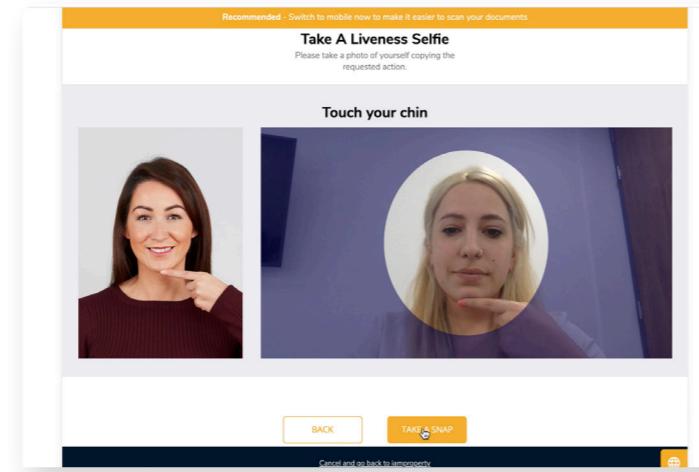
This is the most reliable and secure method to determine whether it is a genuine government issued document.

All data is securely stored in the cloud keeping the information safe and secure, in line with GDPR.

Making sure the individual isn't using someone else's ID

We also check that the person presenting the information matches the photo on the ID document and verify with a 'liveness check'

Our passive liveness technology automatically measures and analyses physical characteristics and reactions to determine if the person being captured is live and present. We then compare the image captured to the image stored in the passport RFID chip to verify that the same person is present in both images.



The elements below are automatically extracted from the scanned document and analysed to confirm authenticity:

Check Element	Details
Document number presence check	The Document Number was not found in the Visual Inspection Zone (VIZ).
Sex presence check	The Sex was not found in the Visual Inspection Zone (VIZ).
Personal number presence check	The Personal Number was not found in the Machine Readable Zone (MRZ).
Presence aggregate validator	Gives a high-level result for fields presence validation.
Birth date format validator	The value of the Birth Date is presented in the expected format for this document type.
Expiry date format validator	The value of the Expiry Date is presented in the expected format for this document type.
Field format aggregate validator	Gives a high-level result for format validation.
Birth date & expiry date validator	Verified that the date of birth precedes the document's expiry date.
Birth date in past validator	Verified that the date of birth is before the current system's date and time.
Birth date in range validator	Verified that the date of birth is in the expected logical range for holders of this type of documents.
Semantic date aggregate validator	Gives a high-level result for semantic date validation.
First name cross reference	The extraction engine retrieved the values of the First Name from the Machine Readable Zone (MRZ) and the Visual Inspection Zone (VIZ) and found them to be matching.
Last name cross reference	The extraction engine retrieved the values of the Last Name from the Machine Readable Zone (MRZ) and the Visual Inspection Zone (VIZ) and found them to be matching.
Birth date cross reference	The extraction engine retrieved the values of the Birth Date from the Machine Readable Zone (MRZ) and the Visual Inspection Zone (VIZ) and found them to be matching.
Expiry date cross reference	The extraction engine retrieved the values of the Expiry Date from the Machine Readable Zone (MRZ) and the Visual Inspection Zone (VIZ) and found them to be matching.
Cross reference aggregate validator	Gives a high-level result for cross reference validation.
First name presence check	Verified that the First Name exists in the Machine Readable Zone (MRZ).
First name presence check	Verified that the First Name exists in the Visual Inspection Zone (VIZ).
Last name presence check	Verified that the Last Name exists in the Machine Readable Zone (MRZ).

Check Element	Details
Last name presence check	Verified that the Last Name exists in the Visual Inspection Zone (VIZ).
Birth date presence check	Verified that the Birth Date exists in the Machine Readable Zone (MRZ).
Birth date presence check	Verified that the Birth Date exists in the Visual Inspection Zone (VIZ).
MRZ document type presence check	Verified that the MRZ Document Type exists in the Machine Readable Zone (MRZ).
MRZ code1 presence check	Verified that the MRZ Code1 exists in the Machine Readable Zone (MRZ).
MRZ code2 presence check	Verified that the MRZ Code2 exists in the Machine Readable Zone (MRZ).
Document number presence check	Verified that the Document Number exists in the Machine Readable Zone (MRZ).
Document number check digit presence check	Verified that the Document Number Check Digit exists in the Machine Readable Zone (MRZ).
Expiry date presence check	Verified that the Expiry Date exists in the Machine Readable Zone (MRZ).
Expiry date presence check	Verified that the Expiry Date exists in the Visual Inspection Zone (VIZ).
Expiry date check digit presence check	Verified that the Expiry Date Check Digit exists in the Machine Readable Zone (MRZ).
MRZ first line presence check	Verified that the MRZ First Line exists in the Machine Readable Zone (MRZ).
MRZ first line presence check	Verified that the MRZ First Line exists in the Visual Inspection Zone (VIZ).
MRZ second line presence check	Verified that the MRZ Second Line exists in the Machine Readable Zone (MRZ).
MRZ second line presence check	Verified that the MRZ Second Line exists in the Visual Inspection Zone (VIZ).
MRZ full presence check	Verified that the MRZ Full exists in the Machine Readable Zone (MRZ).
Sex presence check	Verified that the Sex exists in the Machine Readable Zone (MRZ).
Nationality code presence check	Verified that the Nationality Code exists in the Machine Readable Zone (MRZ).
Nationality code presence check	Verified that the Nationality Code exists in the Visual Inspection Zone (VIZ).
Nationality name presence check	Verified that the Nationality Name exists in the Machine Readable Zone (MRZ).

Check Element	Details
Nationality name presence check	Verified that the Nationality Name exists in the Visual Inspection Zone (VIZ).
Birth date check digit validator	Verified that the Birth Date Check Digit is correct.
Expiry date check digit validator	Verified that the Expiry Date Check Digit is correct.
Document number check digit validator	Verified that the Document Number Check Digit is correct.
Composite check digit validator	Verified that the Composite Check Digit is correct.
Personal number check digit validator	Verified that the Personal Number Check Digit is correct.
MRZ check digits aggregate validator	Gives a high-level result for MRZ check digits validation.
MRZ first line length validator	Pass.
MRZ second line length validator	Pass.
MRZ length aggregate validator	Gives a high-level result for MRZ length validation.
Colour validator	Validation color on the white image for either colored or not.
Icao template check	Success: If the MRZ location satisfies the ICAO standards.
Portrait photo presence check validator	Success: If portrait photo is located in the expected region.
Low resolution image	Check the Image resolution.
Ultraviolet dull validator	Dull validator checks the UV colors of the document to understand if its a dummy document that has no uv features or not.
Document number cross reference	The extraction engine failed to extract the Document Number value from the Machine Readable Zone (MRZ) or the Visual Inspection Zone (VIZ) therefore it was not possible to validate the cross checking of the two values.
Sex cross reference	The extraction engine failed to extract the Sex value from the Machine Readable Zone (MRZ) or the Visual Inspection Zone (VIZ) therefore it was not possible to validate the cross checking of the two values.
MRZ full infrared response	The scan data did not contain an infrared illuminated image of the document therefore it was not possible to perform the infrared response validator.
Document segments infrared response detection validator	The scan data did not contain an infrared image.

Parameter checks and cross-references

These elements are automatically extracted using OCR (Optical Character Recognition) and checked/verified using algorithms to verify the Composite Checksum digits, expected date ranges etc.

NOTE: Some characters have been replaced by 'X' to obscure the details.

First name	Kevin
Last name	smith
Document number	542XXXXXX
Nationality name	British
Nationality code	GBR
Sex	Male
Birth date	1976-XX-XX
Expiry date	2026-XX-XX
Personal number	
MRZ standard type	P<
MRZ code1	P
MRZ code2	<

MRZ birth date check digit	5
MRZ expiry date check digit	7
MRZ document number check digit	0
MRZ composite check digit	0
MRZ personal number check digit	0
Birth place	
Issue date	2016-11-21

iamproperty movebutler has been specifically designed to help Estate Agents comply with HMRC guidance.

By combining a risk-based approach with a variety of robust verification checks, movebutler supports staff to complete KYC and Due Diligence easily, whilst keeping everything easily referenced and recorded safely in one place.

Not only does this provide a consistent process, but it also allows your business to provide evidence, for auditing purposes, should HMRC review your AML practices.

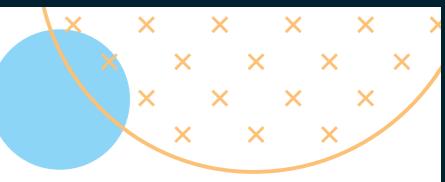
We are constantly reviewing and improving our movebutler service to ensure it meets the latest HMRC guidance and AML legislation.

As MLO you should still take any additional and necessary steps to ensure you are fulfilling all of your obligations, such as making Suspicious Activity Reports (SARs) but we hope you have found this guide informative and helpful.



Appendix

Sanctions coverage.



United Kingdom (UK): HM Treasury

- **Consolidated list of financial sanctions targets (Asset Freeze Target List)**
- **Current Regimes**
 - Afghanistan
 - Al-Qaida
 - Belarus
 - Central African Republic
 - Democratic Republic of Congo
 - Egypt
 - Eritrea
 - Federal Republic of Yugoslavia & Serbia (only cover those funds belonging to Slobodan Milosevic and certain members of his family and other close associates)
 - Iran (Human Rights)
 - Iran (Nuclear Proliferation)
 - Iraq
 - Ivory Coast
 - Lebanon and Syria
 - Liberia
 - Libya
 - North Korea (Democratic People's Republic of Korea)
 - Republic of Guinea
 - Republic of Guinea-Bissau
 - Somalia
 - South Sudan
 - Sudan
 - Syria
 - Terrorism and terrorist financing
 - Tunisia
 - Ukraine (Misappropriation and Human Rights)
 - Ukraine (Sovereignty and Territorial Integrity)
 - Zimbabwe

United States (US): Department of the Treasury - Office of Foreign Assets Control (OFAC)

- **Specially Designated Nationals (SDN) List**
- **OFAC Sanctions Programs**
 - Balkans-related Sanctions
 - Belarus Sanctions
 - Burma Sanctions
 - Central African Republic
 - Cote d'Ivoire (Ivory Coast)-related Sanctions
 - Counter Narcotics Trafficking Sanctions
 - Counter Terrorism Sanctions
 - Cuba Sanctions
 - Democratic Republic of the Congo-related Sanctions
 - Iran Sanctions
 - Iraq-related Sanctions
 - Foreign Sanctions Evaders List (FSE List)
 - Former Liberian Regime of Charles Taylor Sanctions
 - Lebanon-related Sanctions
 - Libya Sanctions
 - Non-Proliferation Sanctions
 - North Korea Sanctions
 - Rough Diamond Trade Controls
 - Sectoral Sanctions Identifications (SSI) List
 - Somalia Sanctions
 - Sudan Sanctions
 - South Sudan Related Sanctions
 - Syria Sanctions
 - Transnational Criminal Organizations
 - Ukraine Related Sanctions

US: Department of State - Bureau of International Security & Non-Proliferation Sanctions

- **Non-proliferation Sanctions**
 - Iran and Syria Non-proliferation Act
 - Iran Non-proliferation Act of 2000
 - Iran, North Korea, and Syria Non-proliferation Act Sanctions (INKSNA)
 - Sanctions for the Transfer of Lethal Military Equipment
 - Chemical and Biological Weapons Sanctions Laws
 - Missile Sanctions Laws
 - Iran-Iraq Arms Non-proliferation Act of 1992
 - Executive Order E.O. 12938
 - Executive Order E.O. 13382
- **United Nations (UN): Security Council Committees • Resolutions 751 & 1907 – Somalia & Eritrea**
 - Arms Embargo (Consolidated List)
 - Travel Ban (Consolidated List)
 - Assets Freeze (Consolidated List)
- **Resolution 1267 & 1989**
 - Al-Qaida and associated Individuals and Entities
 - Consolidated List
- **Resolution 1518 – Iraq and Kuwait**
 - List of Individuals
 - List of Entities

Resolution 1521 – Liberia

- Travel Ban List
- Assets Freeze List

Resolution 1533

- Democratic Republic of the Congo
- Consolidated Travel Ban and Assets Freeze List

Resolution 1572 – Cote d'Ivoire

- Consolidated Travel Ban and Assets Freeze List

Resolution 1591 – Sudan

- Consolidated Travel Ban and Assets Freeze List

Resolution 1718 – Democratic People's Republic of Korea

- List of Designated Entities, Goods and Individuals

Resolution 1737 – Iran

- Consolidated Travel Ban and Assets Freeze List

Resolution 1970 – Libyan Arab Jamahiriya

- Consolidated Travel Ban and Assets Freeze List

Resolution 1988 – Taliban and associated Individuals and Entities

- Consolidated Travel Ban and Assets Freeze List

Resolution 2048 – Guinea-Bissau

- Consolidated Travel Ban and Assets Freeze List

Resolution 2127 & 2134 – Central African Republic

- Arms embargo, travel ban and asset freeze

European Union (EU):

- **Consolidated list of persons, groups and entities subject to EU financial sanctions**
- **Restrictive Measures (Sanctions) in Force**
 - Afghanistan
 - Al Qaeda
 - Belarus

- Bosnia and Herzegovina
- Central African Republic
- China
- Democratic Republic of Congo
- Cote d'Ivoire / Ivory Coast
- Egypt
- Eritrea
- Republic of Guinea (Conakry)
- Guinea-Bissau
- Haiti
- Iran
- Iraq
- Democratic People's Republic of Korea (North Korea)
- Lebanon
- Liberia
- Libya
- Moldova
- Myanmar (Burma)
- Russian Federation
- Serbia and Montenegro
- Somalia
- South Sudan
- Sudan
- Syria
- Terrorist Groups (Foreign Terrorist Organisations)
- Tunisia
- Ukraine
- USA (United States of America)
- Yugoslavia (Serbia and Montenegro)
- Zimbabwe

Australia: Australian Transaction Reports and Analysis Centre (Austrac)

- Financial Sanctions (under Information Circulars)

Financial and Market Regulators, Ministries, Law Enforcement and Anti-Corruption Units

- **Albania**
 - Albanian Financial Supervisory Authority
- **Argentina**
 - Comision Nacional de Valores
 - Policia Federal Argentina
- **Australia**
 - Attorney-General's Department
 - Australian Prudential Regulation Authority
 - Australian Securities & Investments Commission (ASIC)
 - Australian Transaction Reports and Analysis Centre
 - Commonwealth of Australian Law
 - Crimenet
 - Crime Stoppers Australian Capital Territory
 - Crime Stoppers Queensland
 - Crime Stoppers South Australia
 - Crime Stoppers Victoria
 - Crime Stoppers Western Australia
 - Department of Foreign Affairs and Trade
 - New South Wales Police Force
 - Reserve Bank of Australia (RBA)
- **Austria**
 - Bundeskriminalamt (Austrian Federal Police)
 - Finanzmarktaufsicht (Financial Market Authority / FMA)
- **Bahamas**
 - Central Bank of Bahamas
 - Securities Commission of the Bahamas
 - Royal Bahamas Police Force

- **European Union (EU):**
 - **Consolidated list of persons, groups and entities subject to EU financial sanctions**
 - **Restrictive Measures (Sanctions) in Force**
 - Afghanistan
 - Al Qaeda
 - Belarus

Bahrain

- Central Bank of Bahrain

Bangladesh

- Securities and Exchange Commission of Bangladesh

Belgium

- Banking, Finance and Insurance Commission (CBFA)
- Financial Services and Markets Authority (FSMA)
- Belgian Federal Police

Belize

- Central Bank of Belize
- International Financial Services Commission

Bermuda

- Bermuda Monetary Authority
- Bermuda Police Service

Bolivia

- Bolsa Boliviana de Valores

- **Bosnia and Herzegovina**
 - Securities Commission of the Republic of Srpska
 - Securities Commission of the Federation of Bosnia and Herzegovina

Brazil

- Departamento de Investigacoes Sobre Narcoticos
- Comissao de Valores Mobiliarios (CVM / Securities and Exchange Commission)

British Virgin Islands

- Financial Services Commission

Bulgaria

- Financial Supervision Commission

Canada

- Alberta Securities Commission
- British Columbia – Combined Forces Special Enforcement Unit

- British Columbia Securities Commission
- Canadian Securities Administrators
- Department of Foreign Affairs and International Trade Department of Public Safety

France

- Financial Transactions and Reports
- Analysis Centre of Canada

Estonia

- Finantsinspeksiion (Financial Supervision Authority)

Ethiopia

- Ethiopia Commodity Exchange (ECE)

Finland

- Finanssivalvonta (Finish Financial Supervision Authority)

Germany

- Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin / Federal Financial Supervisory Authority)
- Bundeskriminalamt (Federal Criminal Police Office)
- Polizei Bayern (Bavarian State Police)

Ghana

- Securities and Exchange Commission (SEC)

Gibraltar

- Financial Services Commission

Greece

- Hellenic Capital Market Commission (HCMC)

Guatemala

- Bolsa de Valores Nacional, S.A.

Guernsey

- Financial Services Commission

Honduras

- Central Bank of Honduras

Hong Kong (China)

- Hong Kong Government News

India

- Central Bureau of Investigation

Indonesia

- Indonesian Capital Market Executive Agency (Bapepam)

Ireland

- Central Bank of Ireland

Isle of Man

- Financial Supervision Commission

Israel

- Bank of Israel

Italy

- Commissione Nazionale per la Società e la Borsa

Jamaica

- Financial Services Commission

Japan

- Financial Services Agency (FSA)

Kenya

- Capital Markets Authority (CMA)

Korea, South

- Foreign Trade of Korea

Latvia

- Financial and Capital Market Commission

Liberia

- Liberia Anti-Corruption Commission (LACC)

China

- China Securities Regulatory Commission

Colombia

- Superintendencia Financiera de Colombia

Croatia

- Comision Nacional Supervisora de Empresas Y Valores

Belize

- Departamento Administrativo de Seguridad

Bolivia

- Superintendencia General de Valores de Costa Rica (SUGEVAL)

Cyprus

- Cyprus Securities and Exchange Commission

Bosnia

- Bosnia and Herzegovina

Bermuda

- Bermuda Monetary Authority

Bolivia

- Bermuda Police Service

Bolivia

- Bolivia Monetary Authority

Bolivia

- Bolivia Police Service

Bolivia

- Bolivia Monetary Authority

Bolivia

- **Liechtenstein**
 - Financial Market Authority (FMA)
 - Landespolizei Liechtenstein
- **Lithuania**
 - Insurance Supervisory Commission
 - Securities Commission
- **Luxembourg**
 - Commission de Surveillance du Secteur Financier (CSSF)
- **Macao (China)**
 - Monetary Authority of Macao
- **Macedonia**
 - Directorate for Prevention of Money Laundering and Terrorism Financing
- **Malawi**
 - Malawi Anti-Corruption Commission
- **Malaysia**
 - Labuan Offshore Financial Services Authority
 - Malaysian Securities Commission
 - Royal Malaysian Police
- **Maldives**
 - Capital Market Development Authority (CMDA)
- **Malta**
 - Malta Financial Services Authority (MFSA)
- **Moldova**
 - Centre for Combating Economic Crimes and Corruption
- **Montenegro**
 - Securities Commission
- **Mauritius**
 - Financial Services Commission
- **Mexico**
 - Centro Mexicano Para La Filantropia
 - Comisión Nacional Bancaria y de Valores (CNBV)
- **Morocco**
 - Conseil deontologique des valeurs mobilières (CDVM)
- **Namibia**
 - Corruption Watch (Namibia)
 - Namibia Financial Institutions Supervisory Authority (NAMFISA)
 - Anti-Corruption Commission
- **Nepal**
 - Commission for the Investigation of Abuse of Authority
- **Netherlands**
 - Autoriteit Financiële Markten (AFM / Netherlands Authority for the Financial Markets)
 - De Juridische Helpdesk
 - De Nederlandsche Bank
 - Insolvency Register
 - Netherlands Most Wanted
 - Opgelicht
 - The Dutch Police
 - Netherlands Antilles (Neth.)
 - Bank van de Nederlandse Antillen
 - New Zealand
 - Ministry of Foreign Affairs and Trade
 - Ministry of Consumer Affairs
 - New Zealand Police
 - Securities Commission
 - Serious Fraud Office
 - Reserve Bank of New Zealand
- **Nicaragua**
 - Superintendencia de Bancos y de otras Instituciones Financieras de Nicaragua
- **Nigeria**
 - Securities and Exchange Commission
 - National Insurance Commission (NIA)
 - Investments and Securities Tribunal (IST)
 - Federal Inland Revenue Services (FIRS)
- **Norway**
 - Finanstilsynet (Financial Supervisory Authority of Norway)
- **Pakistan**
 - Federal Investigation Agency
 - National Accountability Bureau
 - Securities and Exchange Commission of Pakistan
 - State Bank of Pakistan
- **Panama**
 - Comisión Nacional de Valores República de Panamá
- **Paraguay**
 - Comisión Nacional de Valores
- **Peru**
 - Comisión Nacional Supervisora de Empresas Y Valores
 - Superintendencia del Mercado de Valores
- **Philippines**
 - Philippines National Police
 - Securities and Exchange Commission
- **Poland**
 - Polish Financial Supervision Authority
- **Portugal**
 - Comissão do Mercado de Valores Mobiliários (CMVM / Portuguese Securities Market Commission)
- **Puerto Rico (US)**
 - Oficina Del Comisionado De Instituciones Financieras (OCIF)
- **Qatar**
 - Qatar Financial Centre Regulatory Authority
- **Romania**
 - Comisia Națională a Valorilor Mobiliare (Romanian National Securities Commission)
 - Direcția Națională Anticorupție (National Anticorruption Directorate)
- **Russian Federation**
 - Ministry of the Interior
 - The Presidential Office
- **Rwanda**
 - Rwanda Revenue Authority (RRA)
 - Rwanda Public Procurement Authority (RPPA)
 - National Public Prosecution Authority (NPPA)
- **Saint Kitts and Nevis**
 - St. Kitts Financial Services
 - Nevis Financial Services
- **Saudi Arabia**
 - Capital Market Authority (CMA)
 - Ministry of Interior
- **Serbia**
 - Securities Commission
- **Sierra Leone**
 - Sierra Leone Anti-Corruption Commission
- **Singapore**
 - Commercial Affairs Department
 - Central Narcotics Bureau
 - Monetary Authority of Singapore
- **Slovakia**
 - Narodna Banka Slovenska (National Bank of Slovakia)
- **Slovenia**
 - General Police Directorate
 - Securities Market Agency (ATVP)
 - Ministry of the Interior
- **South Africa**
 - Code of Conduct Bureau (CCB - Legal Matters)
 - Independent Corrupt Practices and Other Economic and Financial Crimes Commission (EFCC)
 - Nigerian Financial Intelligence Unit (NFIU)
- **Spain**
 - Comisión Nacional Del Mercado de Valores (CNMV)
 - Cuerpo Nacional de Policía (National Police)
- **Sri Lanka**
 - Securities and Exchange Commission of Sri Lanka
- **Sweden**
 - Finansinspektionen (Swedish Financial Supervisory Authority)
- **Switzerland**
 - State Secretariat for Economic Affairs
 - Swiss Financial Market Supervisory Authority (FINMA)
 - Swiss Police
- **Syria**
 - Damascus Securities Exchange
 - Syrian Commission on Financial Markets and Securities
- **Taiwan**
 - Financial Supervisory Commission
 - Ministry of Justice – Investigation Bureau
- **Tanzania**
 - Capital Markets Authority
 - Prevention and Combating of Corruption Bureau (PCCB)
- **Thailand**
 - Securities and Exchange Commission
- **Tunisia**
 - Conseil du Marché Financier (CMF)
- **Turkey**
 - Capital Markets Board
- **Uganda**
 - Capital Markets Authority (CMA - Uganda)
 - The Inspectorate of Government (IGG)
 - Directorate of Public Prosecutions Uganda (DPP)
 - The Public Procurement Disposal of Public Assets Authority (PPDA)
- **United Arab Emirates**
 - Dubai Financial Services Authority (DFSA)
- **United Kingdom**
 - Action Fraud
 - Bank of England
 - Charity Commission
 - Cheshire Constabulary
 - Child Exploitation and Online Protection Centre
 - City of London Police
 - Companies House
 - Crimestoppers
 - Criminal Cases Review Commission
 - Crown Prosecution Service
 - Devon and Cornwall Police
 - Financial Conduct Authority (FCA)
 - General Medical Council
 - Hampshire Constabulary
 - Health & Safety Executive
 - HM Revenue and Customs
 - HM Treasury
 - Home Office
 - Insolvency Service
 - Insolvency Service (IVA)
 - Investment Management Regulatory Organisation
 - Insurance Fraud Investigators Group
- **Lancashire Constabulary**
 - Law Society Gazette
 - National Credit Regulator (NCR)
 - Corruption Watch (South Africa)
 - Securities and Exchange Commission (SEC - South Africa)
 - South African Police Service
 - National Prosecuting Authority (NPA)
- **SEC**
 - Lloyd's Insurance Market
 - Metropolitan Police
 - National Extremism Tactical Coordination Unit
 - News Distribution Service
 - NHS Business Services Authority
 - Personal Investment Authority
 - Prudential Regulatory Authority (PRA)
 - Royal Institution of Chartered Surveyors
 - Scottish Solicitors' Discipline Tribunal
 - Securities and Futures Authority
 - Serious Fraud Office
 - Serious Organised Crime Agency
 - Solicitors Regulation Authority
 - The Institute of Chartered Accountants in England and Wales
 - The Institute of Chartered Accountants Scotland Tribunals Service
 - United States of America (Federal)
 - America's Most Wanted
 - Bureau for International Narcotics and Law Enforcement Affairs
 - Bureau of International Security & Non-Proliferation Sanction
 - Central Intelligence Agency
 - Commodity Futures Trading Commission
 - Court of International Trade
 - Department of State
 - Department of State – Directorate of Defense Trade Controls
 - District Attorney's Office
 - Department of Commerce - Bureau of Industry and Security
 - Department of Health & Human Services - Office of Inspector General
 - Department of Health & Human Services – US Food and Drug Administration
 - Department of Homeland Security – US Customs and Border Protection
 - Department of the Treasury
 - Department of the Treasury - Financial Crimes Enforcement Network (FinCEN)
 - Department of the Treasury - Office of the Comptroller of the Currency (OCC)
 - Department of the Treasury - Office of Environmental Protection Agency
 - Excluded Parties List System (EPLS)
 - Federal Bureau of Investigation
 - Federal Deposit Insurance Corporation
 - Federal Reserve Board
 - Federal Trade Commission
 - Financial Crimes Enforcement Network
 - Financial Industry Regulatory Authority
 - Food and Drug Administration
 - Foreign Assets Control (OFAC)
 - Federal Deposit Insurance Corporation (FDIC)
 - Federal Reserve Board
 - Federal Trade Commission
 - Financial Industry Regulatory Authority (FINRA)
 - Immigration and Customs Enforcement
 - National Association of Securities Dealers
 - National Credit Union Administration
 - National Futures Association
 - Naval Criminal Investigative Service (NCIS)
 - Occupational Safety and Health Administration
 - Office of Inspector General
 - Office of the Comptroller of the Currency
 - Office of Thrift Supervision
 - Rewards for Justice
 - Securities and Exchange Commission
 - **Zambia**
 - United States Bureau of Alcohol, Tobacco, Firearms and Explosives
 - United States Department of Justice – Antitrust Division
 - United States Department of Justice – Civil Division United States Department of Justice – Executive Office for Immigration Review (EOIR)
 - United States Department of Justice – Office of the Pardon Attorney
 - United States Department of Justice – Office of Public Affairs
 - United States Department of Justice of Justice – Office of the Coordinator for Counterterrorism
 - United States Department of Justice – Bureau of Diplomatic Security
 - United States Drug Enforcement Administration
 - United States Marshals Service
 - United States Naval Criminal Investigative Service
 - United States Postal Inspection Service
 - US Air Force Office of Special Investigations
 - US Secret Service
 - US Treasury
 - **Zimbabwe**
 - Securities Commission of Zimbabwe (SCZ)
 - Reserve Bank of Zimbabwe
 - Zimbabwe Revenue Authority (ZRA)
 - **Regional**
 - Eastern Caribbean Central Bank (ECCB)
 - European Parliament
 - European Sanction
 - West African Economic and Monetary Union
 - West African Monetary Union
 - Union Conseil régional de l'épargne publique et des marchés financiers (CREPMF)
 - **International**
 - International Chamber of Commerce (ICC)
 - Commercial Crime Services
 - Interpol Red Corner Notices etc.
 - United Nations Security Council – Sanctions
 - World Bank De Barred List

The list is not exhaustive as general media and other sources are regularly added and some of the information appearing in the list may have changed since the last update.



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