LGL-POL-09

Torus Group Anti-Money Laundering (AML) Policy

January 2026

0.	DOCUMENT CONTROL
0.1	**SUMMARY**
	The subject of this document is the Anti-Money Laundering Policy

0.2 DOCUMENT INFORMATION

Role	**Name/Position**	**Date**
Author	Susan Longworth, Finance Systems, Treasury and Transactional Lead	January 2026
Approved by	Torus (Group) Board	February 2026
Document Reference	LGL-POL-09	

0.3 DOCUMENT STATUS HISTORY

Version	**Date**	**Change owner**	**Reason for Update**
1	Nov 2018	Eric Summers	New Policy for 'New' Torus
2	Nov 2019	Ronnie Clawson	Agreed review
3	Jan 2023	Catherine Fearon	3 Year review
4	Jan 2026	Susan Longworth	3 Year review

0.4 DOCUMENT REVIEW DATE

Review Due	January 2029
Responsible Officer	Susan Longworth

0.5 DISTRIBUTION

Name / Department	**Title**
Torus	All Staff

0.6 ASSOCIATED DOCUMENTS

Ref: LGL-PRC-08	**Title: Torus Group Anti-Money Laundering Procedure**
Ref:	**Title:**

Contents Page

1. Scope

1.1 In order to comply with its legal obligation, Torus Group (hereafter referred to as "Torus") has established this Anti-Money Laundering (AML) Policy which sets out the reasons such a policy is in place. All relevant procedures outlined in this policy must be followed to ensure compliance.

1.2 This policy is supported by Torus' Anti-Money Laundering (AML) Procedures. Together, these documents form the Group's Anti-Money Laundering Strategy and underpin Torus' commitment to comply with its obligations.

1.3 The policy is owned, maintained and reviewed by Group Director of Finance, and approved by the Board.

1.4 This policy aligns with Torus' corporate objective of maintaining a strong and viable corporate core. This policy has been written with that corporate value in mind.

1.5 Failure to comply with money laundering legislation may result in civil and criminal penalties for Torus, its Board members, all employees (including agency staff) and could cause reputational damage.

1.6 This policy applies to Board Members, all employees (including agency staff), contractors, consultants and customers where relevant.

2. Policy Statement

2.1 The purpose of this policy is to enhance Torus' compliance with AML legislation, assist law enforcement in combating illegal money laundering, and minimise the risk of Torus' resources being used for unlawful purposes.

2.2 This policy is designed to comply with the UK AML and counter-terrorist financing regulatory framework, including but not limited to:

- Proceeds of Crime Act 2002 (POCA)
- Terrorism Act 2000
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended) ("MLRs 2017")
- Financial Services and Markets Act 2000 (FSMA)
- FCA Handbook, including:
  - SYSC (Senior Management Arrangements, Systems and Controls)
  - JMLSG Guidance (as approved by the FCA)
- UK Sanctions and Anti-Money Laundering Act 2018

2.3 Torus recognises its responsibilities under Economic Crime (Transparency and Enforcement) Act 2022.

2.4 Torus carries out regulated activities and therefore is a Relevant Person for the purposes of the MLRs 2017.

2.5 Torus is committed to preventing, detecting and reporting money laundering, terrorist financing, and other financial crimes and will take all necessary measure to comply with applicable legislation and regulations.

3. Implementation

Torus will undertake the following steps to ensure compliance with the MLRs 2017:

- **General risk assessment:** produce a documented AML risk assessment covering its customers, countries of operation, products and services, transactions, delivery channels and the size and nature of the business.
- **Risk mitigation policies:** Establish written policies and controls to address money laundering and terrorist financing risks, including customer due diligence procedures, reporting, record keeping and ongoing monitoring which are proportionate to the risks identified. All policies will be approved by Senior Management.
- **Level of due diligence:** Conduct the appropriate level of due diligence having considered both customer and geographical risk factors. Maintain a list of high-risk jurisdictions, which, if involved in a transaction, will require enhanced due diligence and additional risk assessment.
- **Reliance on third parties:** Third-party customer due diligence (CDD) may only be relied upon if the third party is subject to the MLR 2017 or an equivalent regime and a written agreement exists to immediately provide copies of all CDD documentation in respect of the customer and/or its beneficial owner upon request. Torus retains fully responsible for compliance when relying on third parties.
- **Politically exposed persons (PEPs):** Apply the appropriate enhanced due diligence to PEPs, their family members, and known close associates in accordance with Regulations 33-35 of the MLRs 2017.
- **Sanctions screening:** Screen customers and transactions against applicable sanctions lists and take appropriate action when a match or potential match is identified.
- **Communication:** Ensure this policy is communicated to all staff and made available to tenants, stakeholders and other interested parties.
- **Review:** The policy will be reviewed every 3 years to ensure it remains fit for purpose and may be updated at any time if there are any significant changes in regulations, business activities, or risk profile.

4. AML Governance and Responsibilities

4.1 The Responsibilities of the named roles are as follows:

4.1.1 **Board / Senior Management**

- Approve and oversee the AML policy
- Ensure adequate resources for AML compliance
- Promote a strong culture of compliance

4.1.2 **Money Laundering Reporting Officer (MLRO)**

- Receive reports of suspicious activity from employees
- Evaluate internal reports to determine if there is evidence or suspicion of money laundering or terrorist financing
- Report suspicious activity or transactions to the National Crime Agency (NCA) by submitting a Suspicious Activity Report (SAR)
- Submit Defense Against Money Laundering (DAML) SARs when necessary
- Oversee the implementation of AML controls and procedures
- Conduct money laundering risk assessments
- Ensure staff receive appropriate AML training
- Act as the primary point of contact with regulators

4.1.3 Officer for Compliance – Group Head of Finance

- Deputies for the MLRO where required.
- Oversee money laundering risk assessments
- Oversee implementation of the MLRO role.
- Monitor compliance with AML laws and regulations

4.1.4 All Employees

- Comply with this AML policy and associated procedures
- Complete mandatory AML training
- Where relevant to their role, monitor transactions to identify unusual or suspicious activity
- Report knowledge or suspicion of money laundering or terrorist financing to the MLRO promptly
- Avoid disclosing any suspicion to related parties, as tipping-off is a criminal offence under POCA and the Terrorism Act

4.1.5 Additional Support - Group Head of Legal Services

- Provide legal advice to the MLRO as required
- Review of the AML policy

4.1.6 Contacts

Money Laundering Reporting Officer
Susan Longworth
Finance Systems, Treasury and Transactional Lead
The Observatory
Old Hay market
Liverpool
L1 6RA

Officer for Compliance
Karla Nugent
Group Head of Financial Compliance and Tax
The Observatory
Old Hay market
Liverpool
L1 6RA

Legal Counsel
Catherine Fearon
The Observatory
Old Hay market
Liverpool
L1 6RA

4.2 Breaches of this policy may result in disciplinary action. Serious breaches may be reported to regulators or law enforcement authorities.

5. Monitoring and Review

5.1 The policy will be owned, maintained and updated by Group Director of Finance and approved by the Board.

5.2 The policy will be reviewed every 3 years, or sooner if a reported breach occurs or if there are significant changes in regulations, business activities, or risk profile.