

ANTI MONEY LAUNDERING POLICY

LAST REVIEWED 23 APRIL 2025

As an organisation we are committed to the highest standards of ethical conduct in all our business activities including those related to our financial operations. Our anti money laundering policy is an element of that practice and applies to all activities and to all members of Governance Connected staff including those working in an associate capacity.

As chief executive officer, Liz Bharj will be responsible for implementing this policy and acting as nominated officer in respect of receiving and reviewing any reports of suspicious activity, maintaining relevant logs and determining whether to report activity to the national crime agency.

Our risk assessment indicates that due to the nature of our services and the fact our clients are almost exclusively UK state funded schools the risk of Governance Connected being subject to the attempt to launder money through our organisation is low.

We do however recognise although low, risk always exists and that as we continue to grow including with the aim of diversifying our client base we must always remain vigilant to this risk increasing.

To guard against current and future risk and demonstrate our commitment to the highest standards of ethical conduct in all our business activities we will:

- Ensure we keep up to date with relevant legislation and guidance
- Review our general AML risk assessment in the event of significant change to guidance, our client base, or every 3 years as appropriate
- Undertake relevant checks including with regard to identity to risk assess our clients and associates.
- Transact all business through recognised accounting software
- Only accept payment from organisational bank accounts
- Only refund payments to the bank account from which the payment was made
- Avoid dealing in cash transactions
- Maintain records of previous clients for a period of 5 years
- Ensure all colleagues are aware of our commitment to guarding against money laundering and particularly those handling financial matters within our organisation are well briefed and alert to suspicious activity and the requirement to report that activity to nominated officer/national crime agency as appropriate

Agreed on 23/4/25

Anne Robinson - Director