**Anti-Money Laundering (AML) Policy**

**Last Updated:** 10/09/2025

**1. Purpose and Scope**

Nivek Catering Supplies Ltd (“Nivek”) is committed to conducting business in a lawful, ethical, and transparent manner. This Anti-Money Laundering (AML) Policy outlines our commitment to preventing the use of our products, services, and financial systems for money laundering or terrorist financing.

This policy applies to all employees, contractors, directors, and any third parties acting on behalf of Nivek.

**2. Definition of Money Laundering**

Money laundering is the process by which criminals disguise the origins of illicit funds to make them appear legitimate. It typically involves three stages:

* Placement: Introducing illicit funds into the financial system.
* Layering: Concealing the source of funds through complex transactions and transfers.
* Integration: Reintroducing funds into the legitimate economy, making them appear lawful.

Terrorist financing may involve both legitimate and illegitimate funds used to support terrorist activities.

**3. Legal and Regulatory Framework**

Nivek complies with all relevant legislation and regulatory guidance, including:

* The UK Money Laundering, Terrorist Financing and Transfer of Funds Regulations (MLRs).
* The Proceeds of Crime Act 2002 (POCA).
* The Terrorism Act 2000.
* The EU AML Directives where applicable.
* The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

As an ISO 9001 and ISO 14001 certified business and active member of the Foodservice Packaging Association (FPA) and Cleaning & Hygiene Suppliers Association (CHSA), we uphold the highest standards of governance and compliance.

**4. Customer Due Diligence (CDD)**

We perform due diligence measures before establishing a business relationship and on an ongoing basis. This includes:

* Verifying the identity of customers, directors, and beneficial owners.
* Assessing the risk profile of customers and transactions.
* Requesting additional information where required (e.g., for higher-risk customers).
* Screening against sanctions and politically exposed persons (PEP) lists.

**5. Record Keeping**

Nivek maintains accurate and complete records to evidence compliance with AML requirements. These include:

* Copies of identification documents and verification records.
* Records of financial transactions and invoices.
* Risk assessments and due diligence checks.
* Internal and external reports relating to suspicious activity.

All records will be securely stored in line with statutory requirements.

**6. Suspicious Activity Reporting**

Employees are required to remain vigilant for unusual or suspicious transactions, including but not limited to:

* Large or unusual cash payments.
* Unclear ownership structures.
* Inconsistent purchasing behaviour.
* Requests for transactions that lack a clear business purpose.

All suspicions must be promptly reported to the AML Compliance Officer (MLRO). Where necessary, the AML Officer will escalate to the UK National Crime Agency (NCA) in the form of a Suspicious Activity Report (SAR).

**7. Internal Controls and Training**

To ensure compliance, Nivek has implemented:

* Staff training: Regular AML awareness training for employees.
* Internal audits: Periodic reviews of processes and transactions.
* Reporting lines: A clear chain of responsibility to the AML Officer.
* Policies and procedures: Aligned with best practice and updated as regulations change.

**8. Data Protection and GDPR Compliance**

All AML activities are carried out in accordance with data protection laws. Nivek ensures:

* Lawful basis for processing personal data.
* Data minimisation (only data strictly necessary for AML purposes is collected).
* Secure storage of AML records.
* Respect for data subject rights, including access and correction requests.

**9. Policy Review**

This policy will be reviewed annually or sooner if required by changes in legislation, regulations, or company operations.

**10. Contact Information**

For any questions regarding this policy, or to report suspicious activity, please contact:

Richard Barrett
AML Compliance Officer
Nivek Catering Supplies Ltd
Email: sales@nivekonline.co.uk
Tel: 01622 870714