

CRIMINAL FINANCES ACT

GROSS HILL PROPERTIES LTD

SYDNEY & LONDON PROPERTIES LTD

Statement of Compliance

Criminal Finances Act 2017

The Gross Hill Properties Ltd group of companies, including Sydney & London Properties and all subsidiaries and associated companies, conducts its business with financial probity and transparency. We are committed to the prevention of the criminal facilitation of tax evasion by all 'associated persons'. While we consider ourselves a 'low risk' business, we adopt a risk-based approach to ensure that sufficient preventative and detective measures are in place to mitigate against the risk of the business being used for the criminal facilitation of tax evasion.

Risk assessment

We undertake regular risk assessments to determine the nature and extent of exposure to the risk of any associated persons engaging in activity that could facilitate tax evasion. The risk register is reviewed and updated as and when required, and at least on an annual basis by the Board of Directors.

Key personnel within the senior management team are briefed and will keep up to date with legislation, regulations and best practice in relation to preventing associated persons from engaging in the criminal facilitation of tax evasion.

We undertake due diligence on all associated persons/companies and only transfer funds to approved customer accounts. Payments will only be made to third parties in exceptional circumstances, subject to our internal approval process. For major transactions, solicitor client accounts are used as standard.

We only use managing agents who comply with RICS guidelines and the Client Money Protection Scheme.

We do not and will not work with others who do not share our commitment to preventing the criminal facilitation of tax evasion, in the UK or abroad.

This statement and the risk review are periodically reviewed by senior management, and by the board of directors on an annual basis.