

OLAPA Ltd

Anti-Money Laundering (AML) Policy – Public Statement

Location: Barnsley, United Kingdom

Business Activity: Online Land & Property Auction Services

1. Introduction

OLAPA Ltd (“the Company”) is committed to preventing money laundering and terrorist financing and to complying fully with all applicable UK legislation, including the **Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended)**, HMRC guidance, and related statutory obligations.

This document provides a **high-level, public-facing overview** of the Company’s approach to Anti-Money Laundering (AML). It does not include confidential internal controls, risk scoring methodologies, or sensitive operational details.

2. Business Overview

OLAPA Ltd operates an online platform facilitating the sale and auction of land and property within the United Kingdom. As a business involved in property transactions, OLAPA Ltd recognises that such activity can present money laundering and terrorist financing risks and therefore maintains appropriate systems and controls to mitigate those risks.

3. AML Risk-Based Approach

OLAPA Ltd applies a **risk-based approach** to AML compliance. This means that the level of due diligence and monitoring applied to customers and transactions is proportionate to the level of risk identified.

The Company considers risk factors including, but not limited to:

- The nature of the customer
- The type of transaction or service provided
- Geographic considerations
- The method by which services are accessed

A detailed business-wide AML risk assessment is maintained internally and reviewed regularly.

4. Customer Due Diligence (CDD)

OLAPA Ltd carries out Customer Due Diligence on customers prior to establishing a business relationship or facilitating transactions. This may include:

- Verifying customer identity
- Confirming ownership or control of legal entities
- Understanding the purpose and nature of the business relationship

Where required by law or regulation, additional checks may be applied.

5. Enhanced Due Diligence (EDD)

Enhanced Due Diligence is applied in situations that present a higher risk, including (but not limited to):

- Customers or transactions linked to higher-risk jurisdictions
- Politically Exposed Persons (PEPs)
- Unusual or complex transactions

EDD measures are proportionate and aligned with regulatory guidance.

6. Ongoing Monitoring

OLAPA Ltd undertakes ongoing monitoring of customer relationships and transactions to ensure they remain consistent with the Company's understanding of the customer and the services being provided.

Any unusual or suspicious activity is reviewed in accordance with internal procedures.

7. Reporting Suspicious Activity

OLAPA Ltd has internal procedures for identifying and reporting suspicious activity. Where required, reports are submitted to the appropriate UK authorities in line with legal obligations.

The Company strictly complies with laws relating to confidentiality and the prohibition of "tipping off".

8. Governance and Oversight

OLAPA Ltd has appointed a **Money Laundering Reporting Officer (MLRO)** who is responsible for overseeing AML compliance, maintaining policies and procedures, and acting as the primary point of contact with regulatory and law enforcement authorities.

Details of internal roles and responsibilities are maintained within confidential internal documentation.

9. Staff Training

All relevant staff receive appropriate AML training to ensure they understand:

- Their legal responsibilities
- How to identify suspicious activity
- How to follow internal reporting procedures

Training is refreshed regularly and updated to reflect regulatory changes.

10. Record Keeping

OLAPA Ltd maintains records in accordance with legal and regulatory requirements. Records are securely stored and retained for the required statutory periods and made available to competent authorities upon lawful request.

11. Data Protection

All personal data collected for AML purposes is processed in accordance with the **UK GDPR** and the **Data Protection Act 2018**. Access to data is restricted to authorised personnel only.

12. Review and Continuous Improvement

The Company regularly reviews its AML framework to ensure it remains effective, proportionate, and compliant with current legislation and regulatory guidance.

13. Approval

This AML Policy Statement has been approved by senior management of OLAPA Ltd and is reviewed at least annually or following any material change to legislation or business operations.

Last Updated: 25/11/2025

End of Public AML Policy Statement