

Mark Percival Legister

FINANCIAL SANCTIONS POLICY AND PROCEDURES

Introduction:

This financial sanctions policy and procedures document sets out the procedures I follow to comply with the UK financial sanctions regime. I appreciate that it is essential to comply with the legislation on sanctions. Failure to do so could result in serious penalties for my practice.

I work as a sole practitioner so the responsibility for compliance with the financial sanctions regime falls to me. I will review the processes I have in place for compliance with the financial sanctions regime annually.

Risk Assessment:

I have considered the risks that my practice could be exposed to persons or regimes subject to financial sanctions and recorded my assessment. This policy has been developed in response to that risk assessment and I will review this policy annually following my review that risk assessment and make any appropriate changes.

Due Diligence:

The level of sanctions due diligence I apply to new and current clients is appropriate to the size and nature of the risk involved in the matter in question. My new client and matter risk assessment forms ensure a record of the decision on sanctions is made where appropriate and or applicable. Additionally I will record in my register the result of any sanction search for the sake of convenience.

My sanctions due diligence process is:

- Establish the identity of the client and appearer (if different). My obligations under the Notary Practice Rules (NPR) assist here as I have to identify any persons intervening in documents I notarise
- Identify the ultimate beneficial ownership of corporate clients;
- Put the names into the Office of Financial Sanctions Implementation (OFSI) consolidated search engine to check to see if the individuals and entities are designated persons, as appropriate.
- Carefully scrutinise the information received from the OFSI consolidated search engine.
- Carry out the same measures for counterparties to the transaction if I consider appropriate
- Considering whether the work I am being asked to do falls within the general prohibitions in the OFSI Russian sanctions guidance.

I conduct screening before I undertake any work for an individual or entity, where I consider that individual or entity is high risk for sanctions, for example they are based in a high-risk jurisdiction as specified by the Financial Action Task Force or they are established in a country that is subject to the UK sanctions regime currently.

I repeat the screening every six months for those clients whose matters extend beyond six months which is rare in my area of practice.

I have signed up for OFSI alerts and check the names of all newly designated persons against my current client list.

How I deal with false positives:

- If a prospective or current client's name appears on the OFSI consolidated list, I check to see if the result is a false positive.
- The OFSI consolidated list helpfully gives additional information regarding the sanctioned individual. For example, it often specifies country of residence and date of birth.
- I routinely obtain a copy of my client's passport and a proof of address document to comply with my obligations under the NPR, so I check the additional information in the OFSI consolidated list against the information I have in the passport and proof of address document.
- If I am still unclear, I ask the client to confirm their sanctioned status and to provide further information. There is no tipping off offence committed when I ask for this information. When someone is sanctioned they will be aware of their sanctioned status. It is in the public domain.

Reporting Suspected Matches:

If I have investigated a potential match and have been unable to clear it as a false positive, I will take one of the following steps:

- Decline to act
- Cease to act if I have already started acting for the client and they have become sanctioned during the transaction
- Inform OFSI as necessary, and I will look at the OFSI website for guidance on when they need to be informed
- Apply for a licence from OFSI to act for the client, or consider whether my acting for the client will fall within a general licence in place from OFSI at that time
- Freeze any funds I have received from the client and inform OFSI that I have frozen such funds. I do not have a client account, however, and rarely if ever take funds from clients in advance of fees, so do not expect to have to freeze the funds of a designated individual in my practice.
- If I consider that the positive match gives rise to a suspicion under the Proceeds of Crime Act, I will make a suspicious activity report to the National Crime Agency. If that is the case, I will take care not to inform the client in case of tipping off.

Review:

This policy and procedures document was drafted on **19 August 2025** and will be reviewed annually or more frequently on a change in the law and regulation on sanctions.

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19 August 2025