



ISO 9001:2015

Eurotron Instruments (UK) Ltd
Unit 18 Austin Way
Royal Oak Industrial Estate
NN118QY,
Daventry
England
Tel :+ 44(0)1327871044
Fax :+ 44(0)1327301255
sales@eurotron-uk.com
www.eurotron-uk.com

ANTI-MONEY LAUNDRY POLICY STATEMENT

Introduction

Eurotron Instruments UK Ltd take a zero tolerance approach to being involved in illegal/illicit activity, and will fully comply with all relevant sections of the Money Laundering Regulations 2017 (ML Regs) (as amended by the MLR 2019), the Proceeds of Crime Act 2002 (POCA), and the Terrorism Act 2000 (TACT).

Scope

Create awareness of money laundry, how to identify possible red flags and control in place

Who is covered by this policy?

This policy applies to the entire workforce, both permanent and temporary. In addition we expect all our suppliers and contractors to comply with equivalent principles to those set out in this policy and in our Code of Conduct.

What is Money Laundering?

Money laundering is the process of changing 'dirty' money into 'clean' money in order to hide the fact. It may have originated from criminal activity. Money Laundering is the term used for a number of offences involving the proceeds of crime or terrorism funds

How do we identify suspicious activity?

Any member of the workforce dealing with transactions involving income for goods and services (or other income) must be alert to the possibility of money-laundering, particularly where:

- Cash is offered by the customer
- Overpayment is received by us and a refund is made, particularly where a cheque refund is requested
- We receive a suspiciously low tender for goods or services.
- Checking the identity of a new customer / supplier is proving difficult
- An individual from a new customer / supplier is reluctant to provide their details
- There isn't a genuine reason for using the services provided
- A customer / supplier attempts to introduce intermediaries to either protect their identity or hide their involvement?
- A customer requests a cash transaction
- The source of the cash is not known or is unusual
- The transaction doesn't seem normal in the context of the customer's business
- The size or frequency of the transaction is not consistent with the normal activities of the customer
- The pattern of the customer's transactions changes unexpectedly



Eurotron Instruments (UK) Ltd
Unit 18 Austin Way
Royal Oak Industrial Estate
NN118QY,
Daventry
England
Tel :+ 44(0)1327871044
Fax :+ 44(0)1327301255
sales@eurotron-uk.com
www.eurotron-uk.com

ISO 9001:2015

Controls

- Screening and due diligence on all of our customers & suppliers
- Eurotron Instruments UK Ltd accept only BACS or Credit Card Payments
 - Cash deposit on our bank accounts are not allowed and will be rejected and returned
 - Multiple payments to reduce payment values are not accepted
 - Continuous screening of all our received payments
 - Continuous training to make sure we comply

Assessment

Due to the type of activities and geographical market we operate, the risk of Eurotron Instruments to be involved in any illicit activity is **very low**

Policy Communication

This policy is available to all our employees via our intranet and it is included in our employee's hand book.

Employee Responsibility

You have the obligation to read and follow this Policy, to understand and identify any red flags that may arise in their business activities and to escalate potential compliance concerns related to the Managing Director

Implementation

The Managing Director is fully responsible for the implementation and maintaining of this policy

Daventry, 17/01/2021

Massimiliano Moltrasio

Eurotron Instruments UK Ltd
Managing Director

Policy Review Record

Issue	Date	Changes	Responsible
1	07-06-2021	None	MM
1	June 2022	None	MM
1	21-05-2023	None	MM
1	09-05-2024	None	MM
1	02/05/2025	None	MM