

Knight Frank Global Anti-Money Laundering and Counter-Terrorist Financing Policy

Purpose

This policy aims to provide the following:

- To ensure staff are aware of the risks associated with money laundering;
- To outline the requirements Knight Frank sets in relation to anti-money laundering controls;
- To guide staff on who to report to should they have concerns around money laundering.

Why it matters

The organisations within the Knight Frank Global Network play an important role in the global economy and the operation of the world's capital investment and real estate markets. As providers of professional services, we take pride in the part we play in helping to strengthen trust within society, and we recognise our responsibility to carry out our work with due consideration of the public interest.

Knight Frank is committed to complying with all applicable national laws and regulations combatting corruption and money laundering wherever we work and to apply the principles of a global approach in those markets where regulatory frameworks may be less developed. We will continue to develop our approach as we learn from experience, working on three fronts: systems, education and culture.

Criminals often invest the proceeds of their activities into property or use the proceeds to support their lifestyle in the form of paying living expenses (money laundering). In many countries, regulations exist that prohibit agents from dealing with the proceeds of criminal activity.

Terrorist financing is where the funds from dealing in property may be used for terrorism. For the purposes of this policy money laundering also includes terrorist financing.

Scope

This policy applies to all staff employed by Knight Frank. It applies also to consultants, contractors and agency staff in relation to their work for, or on behalf of, Knight Frank.

Knight Frank refers to the member firms of the Knight Frank global network, each of which is a separate legal entity. The Knight Frank global network comprises Knight Frank LLP, its subsidiaries (direct or otherwise), its affiliates and any other entity or practice carrying on business under or including the name Knight Frank or in association with Knight Frank LLP internationally in over 50 territories.

Failure to comply with this policy may result in disciplinary action being taken against any staff involved, or the termination of contracts with contractors and other third parties working for Knight Frank. The Knight Frank Global Network can use the Knight Frank name and resources of the network. Member firms agree to abide by certain common policies and to maintain the standards of Knight Frank.

General Principles

Knight Frank requires that all applicable anti-money laundering laws in every jurisdiction and location where we conduct business must be complied with at all times.

Adequate policies, practices and procedures ("controls") intended to prevent, reduce the risk and impact of, detect and address potential money laundering and to help assure compliance with relevant laws must be implemented and those controls must be enforced locally.

Where there are no specific legal requirements for anti-money laundering controls, Knight Frank requires that appropriate and proportionate controls are put into practice with regular reporting to senior management. These should seek to align with UK standards where possible unless senior management agree otherwise.

Minimum Standards

It is expected that all reasonable measures are taken to minimise the risk of dealing with the proceeds of crime. In order to do this it is required that, as far as is appropriate and proportionate, all members of the Knight Frank network take appropriate steps:

- To establish a client's true identity;
- To establish the client's proper home or business address;
- To report any suspicions to a Department Head or local compliance team.

Understanding risks or suspicious activity

Follow the principle of enhanced due diligence when any of the following apply: The offering of large amounts of cash as the means of payment for property purchases, deposits, rent, interest or fees;

- Inconsistent or weak reasons for paying cash;
- Use of cash coupled with a hurried sale;
- Purchasing a property without viewing;
- Property prices not corresponding to market value;
- The immediate resale of a property;
- Unusual or unexpected involvement of third parties;
- High risk countries or sectors are involved either as owners or funders;
- A poor explanation for the early redemption of mortgages; and
- Whenever Politically Exposed Persons (PEPs) are connected to a transaction or a legal international sanction applies.

Reporting Suspicions

You must make timely reports of suspicious activity through appropriate internal channels, and, where it is required, to relevant regulatory and law enforcement authorities.

You must co-operate with any lawful requests for information made by government or law enforcement agencies. In some countries it may be an offence to inform the customer or client of such requests. You should seek advice from Office or Group management where you are unsure what must or must not be disclosed.

Managing Risk - Know your customer (KYC)

Where required or appropriate to do so, ask for personal identification (passport or a driver's licence) and in order to confirm the address, a utility bill or other recognised formal document. Be on the lookout for document fraud that might indicate that: you are dealing with an imposter; that it is a counterfeit document, or a forgery of a genuine document. If you accept copies of documents, they should be copies of the original document and certified by a recognised and reputable professional person such as a notary, accountant or lawyer.

- Utilise any databases of screening software available in your country to confirm company details and provide an additional check.
- In some countries it is the law to understand the beneficial owner(s) behind all transactions. These are the individuals who ultimately own or control the customer, or on whose behalf a transaction or activity takes place. If it seems the client may be a mere nominee or front for another person, then this would indicate a greater risk and therefore, as far as is possible under local law and regulation, require further investigation into the identity of the beneficial owners.
- Keep a secure record on file of checks you have undertaken (but do not keep copies of personal information where that will conflict with legislation for the protection of individual's personal data).
- Where there are enhanced risks, take steps to satisfy yourself that the source of funding is investigated, including but not limited to the checking source of wealth.

Knight Frank associated persons may offer and accept reasonable and proportionate gifts and entertainment. In judging what are reasonable and proportionate, individuals should consider the value of the gift or benefit, as well as the frequency with which gifts are provided by the giver in question.

Managing Risk - Politically Exposed Persons (PEPs)

Where you have reason to believe that someone is a PEP, then it may be necessary to carry out enhanced due diligence on them. A PEP is someone who holds, or has held in the last 12 months, public office, and is therefore potentially at a greater risk of being subject to allegations of bribery or corruption. The definition also covers immediate family members of the individual and known close associates.

Where someone is known to Knight Frank to be a PEP, then it is important to take some practical additional steps to, as far as is proportionate and permissible by law or regulation:

- Establish the source of their funds, or of their wealth;
- Obtain additional information on the client;
- Obtain additional information on the intended nature of the business relationship and on the reasons for intended or performed transactions.

Training

As part of the prevention, identification and detection of money laundering and terrorist financing issues, mandatory training and risk assessments are conducted throughout Knight Frank.

Whistleblowing

Knight Frank maintains a *Global Whistleblowing Policy*, incorporating an independent hotline, to ensure that individuals can report concerns, confidentially where possible, and to ensure that such concerns are investigated and remediated appropriately.

In line with the *Global Whistleblowing Policy*, Management have a responsibility to investigate any reports of wrong-doing. Inaction in investigating reported or known issues will not be tolerated and will be subject to disciplinary action.

Where there is suspicion of a bribery incident taking place, staff should inform the UK Best Practice team in the first instance, who will liaise with the local incident management team to determine the correct approach.

Bribery incidents impacting clients will be escalated to the end client via the Client Relationship Manager/ Lead Partner in discussion with Best Practice and the incident management team. The Whistleblowing hotline is available to all staff should they feel uncomfortable reporting to the UK Best Practice team.

Policy implementation

This policy is to be adhered to by all entities part of the Knight Frank Global Network. This policy will be made available to the Knight Frank Global Network via the Knight Frank website and other applicable platforms.

Monitoring and review

This policy will be reviewed in line with all other global policies at least annually. If there is a business or legislative reason for it to be reviewed more frequently, then this will be conducted by the UK Best Practice team.

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Prepared: April 2025
Exec Sponsor: William Beardmore-Gray
Position: Senior Partner and Chairman
Review Date: April 2026

Appendix A: Scope definitions extract from Knight Frank's Global Corporate Governance Policy

The **Knight Frank Group** includes:

- All entities which are **subsidiaries** and governance, and control is enforced via a majority shareholding *greater than 50%*. A subsidiary is an entity that is controlled by the parent.
- UK registered **limited liability partnerships** whereby a direct Knight Frank LLP subsidiary is named as a designated member.
- **Associates** are entities which Knight Frank LLP or an immediate subsidiary has significant influence, but not control over the operating entity. Significant influence is governed by a shareholders agreement, between 20%-50% equity investment is held.
- **Equity investments** are entities which Knight Frank LLP or an immediate subsidiary has neither significant influence nor control over the operating entity. This is usually where the shareholding *is less than 20%*. However, significant influence/control may be demonstrated through a shareholders agreement.

The **Knight Frank Global Network** includes:

- The Knight Frank Group
- **Licensee holders** are entities that no equity or minority equity is held, governed through a brand licence agreement. Licensee holders can be utilising the Knight Frank name as follows: trading as, co-branded or in partnership.