

**AAT**

**INVESTIGATIONS TEAM**

**ORDER BY CONSENT**

**In the matter of**

Ms Mary Thomas (Membership number 10137920)

**Misconduct**

Ms Thomas's professional or personal conduct, was found to be in breach of the *Code of Professional Ethics* and to have posed a risk to the public or was likely to undermine public confidence in the Association or its members; namely:

1. She failed to comply with her obligations under Money Laundering Regulation in force while providing accountancy and/or trust and company services to the public, specifically:
  - (a) No firm-wide assessment
  - (b) No adequate periodic review of your Anti-Money Laundering policies, procedures and controls.
  - (c) No adequate training for relevant staff.
  - (d) No client due diligence or an adequate risk assessment and ongoing monitoring in respect of one or more clients.
  - (e) No adequate documented policies and procedures
2. She failed to issue any or any adequate letters of engagement to one or more clients.

**Finding**

Grounds for disciplinary action existed and the matter was suitable for exercise of the Investigations Team's powers under the *Disciplinary Regulations*.

**Order**

Ms Thomas is hereby:

- I. Reprimanded, with the reprimand remaining active on record for a period of 24 months from the date the sanction is imposed.
- II. A condition is to be imposed on her practising licence, in that you must submit a revised copy of your firm's AML policies, controls and procedures, ensuring they cover all the areas required under the *Money Laundering Regulations* in force, within 30 days of notice.

**Consent**

Ms Thomas has agreed to submit to the decision of the Investigations Team in accordance with Regulation 6 of the *Disciplinary Regulations*.

21 December 2020