



AAT

PROFESSIONAL STANDARDS

ORDER OF AAT

In the matter of

Andrew Greenfield (10383669)

Misconduct

Andrew Greenfield'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. Between on or around 23 December 2013 and on or around 09 June 2020, he failed to have in place adequate Anti-Money Laundering policies, controls and procedures.
2. Between on or around 23 December 2013 and on or around 09 June 2020, he failed to carry out any, or any adequate, client due diligence in respect of one or more clients.
3. Between on or around 23 December 2013 and on or around 09 June 2020, he failed to adequately record the carrying out of client due diligence in respect of one or more clients.
4. Between on or around 23 December 2013 and on or around 09 June 2020, he failed carry out any, or any adequate, review of his Anti-Money Laundering policies, controls and procedures.
5. Between on or around 26 June 2017 and on or around 09 June 2020, he failed to maintain a record in writing of his Anti-Money Laundering policies, controls and procedures.
6. Between on or around 26 June 2017 and on or around 09 June 2020, he failed to carry out an adequate firm-wide money laundering risk assessment.

Finding

Grounds for disciplinary action existed and the matter was suitable for exercise of the Investigations Team's powers under paragraphs 6 and 31 of the *Disciplinary Regulations*.

Order

Andrew Greenfield is hereby:

- i. reprimanded, with the reprimand remaining live on his record for a period of two years
- ii. warned about his future conduct
- iii. subject to a licence condition in that he must submit to a follow-up practice assurance review at his own expense.

Consent

Andrew Greenfield is deemed to have agreed to submit to the decision of the Investigations Team, in accordance with Regulation 6 of the *Disciplinary Regulations*.

24 October 2020