Trident Lifting Solutions

Policy Statement - Trident Lifting Solutions Limited (“Trident”, “the Company”)

Trident Lifting Solutions Limited is committed to high standards of professional conduct, integrity and accountability. As a specialist lifting and crane solutions provider operating in safety-critical environments, we recognise that the behaviour and standards of our people are fundamental to building a strong, respectful culture and protecting our reputation as a trusted industry leader.

We expect everyone working for or on behalf of the Company to act with professionalism, respect and responsibility at all times, reflecting our values and supporting a positive working environment. Clear standards of behaviour are essential to ensure safety, quality and effective collaboration across our projects and teams.

1. Purpose

This policy sets out Trident’s legal and operational framework to prevent, detect, and report:

• Money laundering under the Proceeds of Crime Act 2002 (POCA)
• Terrorist financing under the Terrorism Act 2000
• Offences under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended)
• Obligations under the Sanctions and Anti-Money Laundering Act 2018

Money laundering is a criminal offence punishable by imprisonment of up to 14 years, unlimited fines, or both. Trident operates a zero-tolerance approach and will take immediate action against any breach.

2. Scope

This policy applies to all persons who work for, represent, or are engaged by Trident in any capacity, including supply chain partners, wherever located. It applies to all transactions, business relationships, and financial activities, regardless of size.

3. Statutory Offences Covered

Under UK law, the following are criminal offences:

• Concealing disguising, converting, transferring, or removing criminal property.
• Arrangements becoming involved in arrangements to acquire, retain, use, or control criminal property.
• Acquisition, use, or possession of criminal property.
• Failure to disclose knowledge or suspicion of money laundering.
• Tipping off informing a suspect that a report has been made or that they are under investigation.
• Prejudicing an investigation – falsifying or destroying relevant documents or information.

4. Our Legal Obligations

Trident will:

• Verify identity of customers, suppliers, and beneficial owners before entering into business (Customer Due Diligence).
• Apply Enhanced Due Diligence (EDD) for high-risk customers, politically exposed persons (PEPs), and transactions involving high-risk jurisdictions.
• Maintain records for at least five years from the end of the business relationship or transaction.
• Report suspicious activity to the National Crime Agency (NCA) via the Money Laundering Reporting Officer (MLRO).
• Cease transactions where customer identity or legitimacy of funds cannot be confirmed.
• Train all relevant staff in AML and counter-terrorist financing procedures.

5. Roles & Responsibilities
All Staff
• Complete AML training and refreshers when required.
• Immediately report any knowledge, suspicion, or reasonable grounds for suspicion of money laundering or terrorist financing to the MLRO.
• Never tip off or warn the subject of a suspicious activity report (SAR).

Managers
• Ensure their teams understand AML obligations.
• Support the MLRO in obtaining additional information for SARs.

Money Laundering Reporting Officer (MLRO)
• Appointed Role: Edward Nixon, 0207 222 2020,
• Receive, review, and assess internal SARs.
• Determine whether there are grounds to submit a SAR to the NCA.
• Maintain a register of all SARs and AML-related activity.
• Ensure all AML records are securely retained for at least five years.

6. Customer Due Diligence (CDD) Procedures
Before entering into a business relationship or executing a relevant transaction, Trident will:
• Obtain and verify the customer’s full legal name, address, date of birth, and identification documents.
• Verify beneficial ownership (for companies, trusts, or partnerships).
• Confirm source of funds and source of wealth.
• Screen against UK and international sanctions lists.
• Refuse to proceed if identity cannot be fully verified.

7. Suspicious Activity Indicators
Examples include:
• Unexplained large cash payments or frequent cash transactions.
• Payments from or to unrelated third parties.
• Funds from high-risk jurisdictions with no legitimate reason
• Reluctance to provide identification or corporate documents.
• Structuring transactions to avoid reporting thresholds.

8. Internal Reporting Procedure
• Complete an Internal Suspicious Activity Report (SAR) form.

• Send the SAR immediately and confidentially to the MLRO.
• Do not inform any other person, including the subject of the suspicion
• The MLRO will assess and, if necessary, submit a formal SAR to the NCA.
• Do not proceed with the transaction unless authorised by the MLRO.

9. Training & Awareness
• Mandatory AML training for all relevant staff on induction and at least every 12 months thereafter.
• Training will cover legal requirements, recognising suspicious activity, and internal reporting.
• Completion of training is a condition of continued employment in relevant roles.

10. Enforcement & Disciplinary Action
• Any breach of this policy may result in:
• Immediate suspension pending investigation.
• Disciplinary action up to and including dismissal for gross misconduct.
• Referral to law enforcement authorities.
• Termination of contracts with third parties.

11. Policy Review
This policy will be reviewed annually, or sooner if there are changes to legislation, regulatory guidance, or Trident operations.

AUTHORISED AND SIGNED

SIGNED

Chris Conway
Director

Review: **Annually**
Date: **28/08/2026**
Next Review: **28/08/2027**

SIGNED

Martina Oyite
Chief People Officer

Review: **Annually**
Date: **28/08/2026**
Next Review: **28/08/2027**