

HMRC's 34 New AML Requirements



What every estate and lettings agent needs to do

On 9 September 2025, HMRC released new rules that require agents to check 34 specific money-laundering risks on every seller and buyer.

If your paperwork and day-to-day process don't include all 34, your Business Wide Risk Assessment (BWRA) and Policies, Controls and Procedures (PCPs) are now out of date and your agency is exposed. This applies even if you rely on digital ID apps, sanctions checks, or PEP (Politically Exposed Person) screening.

Why this matters now more than ever

HMRC issued £3.2 million in fines to around 200 agents in the last enforcement cycle. Many individual penalties were over £50,000.

And with the Financial Conduct Authority (FCA) expected to take over AML supervision soon, anything listed since September '25 will be looked at in future audits.

HMRC's 34 new checks – Are you compliant?

Customer risks



Customer profile not in line with transaction



Customer behaviour (secretive/evasive)



PEPs, family, close associates



Corporate structure not wholly UK-based



Trust customers



REIT/OEIC



Cash-intensive businesses



Joint ventures & reliance agreements



Customers linked to governments of PF-sanctioned regimes



Customers sanctioned by the UK for terrorist activity

Transaction risks



Super-prime property



Multiple property transactions



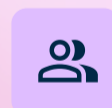
Price not reflective of market value



Complex/unusual corporate structure



Non-transparent legal entity



Potential professional enablers



No commercial purpose



Payment & Source of Funds risks



Bridging finance



Multiple connected companies/common BOs



Proof of Ownership



Identifying co-owners



Property used to manufacture dual-use goods



Linked to PF-sanctioned regimes

Geography risks



High-Risk Third Countries (HRTC)



Overseas (non-HRTC)



Virtual office locations



Offshore ownership/intermediary

Service risks



Multiple services on the same asset



Payments for EAB services



Property auctions



Third-party ID/compliance providers

Delivery channel risks



No face-to-face



Intermediaries

AML is no longer “just a check”

Are you still doing manual checks or checks with an app?

Here's what you may be missing:

- ✗ A proper risk assessment for the client, type of service, how they onboarded, and where funds come from
- ✗ Understanding UBOs (Ultimate Beneficial Owners) and company structures
- ✗ Verifying SoF (Source of Funds) and SoW (Source of Wealth) properly
- ✗ Identifying and validating third-party payers
- ✗ Knowing when EDD (Enhanced Due Diligence) is required - and doing it thoroughly
- ✗ Ongoing monitoring and keeping audit-ready records

Quick questions to ask yourself

- Does your BWRA name and cover all 34 risks?
- Are your PCPs updated whenever your business changes (auctions, remote onboarding, new locations, bridging finance)?
- Can you evidence decisions on SoF, SoW, third-party payments, and UBO tracing?
- Do you know your EDD triggers and can you show what actions were taken?
- Can you tell a clear “risk → checks → decision” story for every file?

! If you answer no to any of the above, there are clear gaps in your compliance. Your agency has to carry this burden which can leave you at risk.

The Coadjute difference

Coadjute provides a fully managed, outsourced AML service that covers all 34 checks for you, automatically triggering EDD whenever a risk appears.

By using Coadjute you can stay focused on sales while we handle your compliance.

Why agents choose to outsource their AML to Coadjute

- ✓ Full coverage of all 34 mandatory checks
- ✓ EDD included whenever a risk appears
- ✓ No admin or training burden on branches
- ✓ HMRC compliance guarantee
- ✓ Saves time – on average 20 hours a week per branch
- ✓ Compliance turns into revenue, because agents can earn on each check
- ✓ Free onboarding and integration
- ✓ Full support from our UK-based Service Team

Get compliance that pays: Free 30 min briefing

We'll explain the 34 checks, where digital ID-only solutions fall short, and what your options are, whether you uplift your own process or outsource it entirely.

No preparation needed.
Book a consultation today.

[BOOK A DEMO →](#)

