



CLIENT MONEY PROCEDURES

This document sets out the Client Money Procedure of BNP Paribas Real Estate Advisory & Property Management UK Limited, and applies to its Strutt & Parker branded businesses. All references to “BNP Paribas Real Estate” in this document refer to the BNP Paribas Real Estate and Strutt & Parker activities.

How and where client money is held

- All client money received by BNPPRE will be held in designated client bank accounts that are in the name of and under the exclusive control of BNP Paribas Real Estate (BNPPRE).
- All such accounts are provided by UK banking institutions regulated by the Prudential Regulatory Authority (PRA) & Financial Conduct Authority (FCA).
- All client accounts are only used to holding client money. BNP Paribas Real Estate’s own money is not held in client accounts.
- BNP Paribas Real Estate operates both general and discrete client money accounts as defined by the RICS Client Money Handling professional standard 1st edition (October 2019).
- General client account titles include the name of BNPPRE and the word “client” in full to distinguish the funds from BNP Paribas Real Estate’s own money.
- Discrete client account titles include an identifier (the name of the client or property) and the word “client” in full.
- All funds are available immediately on demand.
- BNPPRE obtains written confirmation of the bank operating conditions for all client money accounts.
- Where a client requests that money is held in an account to which it and the firm has access, this bank account is set up by the client and is not a firm bank account.

Access to funds

- Access to client bank accounts maintained by BNP Paribas Real Estate are restricted to authorised users who are assigned unique user profiles.
- Access is granted based on role profile and seniority to maintain segregation of duties and hierarchical oversight.
- Only senior employees (Associate Director and above) have access to authorise payments on the client bank accounts.
- All payments from a client account require dual authorisation on the banking platform.

Payment of cash and cheques into a client account

- BNP Paribas Real Estate reserve the right not to accept cash receipts.
- Post opening is conducted by two employees
- All cheques received are logged on a daily basis.
- Cheques that can be banked (i.e. that are not missing key details, or contain errors) are banked on the same day.
- Unbanked cheques are held securely and are returned to sender by registered post if they cannot be banked.
- Electronic receipts are monitored and posted on a daily basis.
- Unallocated electronic receipts and held cheques are recorded and circulated to the business to aid identification on a weekly basis.
- Receipts that remain unidentified for greater than 4 weeks are referred to a senior member of the Client Finance team (Director or above) to authorise appropriate action (return or retain).
- Where attempts to remit funds have been unsuccessful and they have been held for a period in excess of 3 years BNPPRE will transfer the funds to a registered charity in line with RICS Client Money rules.

Authorisation of payments from a client account

- Hierarchical invoice authorisation levels are in place based on job level and value.
- Invoice authorisers are segregated from the teams who maintain the accounting records or process payments.
- All payments are supported by a payment pack which contains relevant evidence to support the payment request.
- Controls are in place to ensure that payments will not cause a client or property balance to become overdrawn.
- All payments made from a client account under the exclusive control of BNPPRE require dual execution.
- Only Associate Directors and above have access to execute payments on the banking platform.
- Changes to creditor bank details are restricted to the data team and require independent validation by a senior member of the Client Finance Team (Associate Director or above).
- Where so authorised, payment of BNPPRE management fees are made in accordance with client agreements.

Interest and bank charges

Please refer to your Property Management Agreement (PMA) for your specific arrangements.

Reconciliation of client bank accounts

- Reconciliations are performed on a monthly basis as a minimum.
- Bank reconciliations follow a standard format demonstrating agreement between bank statement, cash book and where appropriate client ledgers.
- Reconciling items are identified and itemised.
- Reconciliations are supported by relevant system prints.
- Reconciliations are prepared by the reconciliation accountants and reviewed by the Head of Cash & Banking.
- Completed and reviewed reconciliations are retained in an un-editable electronic format.

Information provided to clients about monies held on their account and the frequency of any reports

Please refer to your PMA for your specific arrangements.



Disclaimer

BNP Paribas Real Estate Advisory & Property Management UK Limited, a private limited company registered in England & Wales (with registered number 4176965) and whose registered office is at 10 Harewood Avenue London, NW1 6AA. We are a member of the Royal Institution of Chartered Surveyors (RICS) (with membership Number 007555) and subscribe to the RICS Clients Money Protection Scheme. Independent redress is provided by the Property Redress Scheme.