HALLS HOLDINGS LTD CLIENT MONEY HANDLING

POLICIES & PROCEDURES

Definition of Client Money	Client money relates to money of any currency, whether in the form of cash, cheque or electronic transfer, which is: • held or received on behalf of another person, including money held by a regulated firm as stakeholder; • is not immediately due and payable on demand; • excluding fees paid in advance for professional work agreed to be performed and clearly identifiable as such.
How & Where Client Money is Held	In accordance with the Royal Institution of Chartered Surveyors' (RICS) professional statement (Client Money Handling, effective from 1st January 2020), client money held or received by Halls Holdings Ltd, or any trading name thereof, is banked into a **general clients' bank account** held at **Barclays Bank, 1 Churchill Place, London, EH14 5HP** A **general clients' bank account** is a Client Bank Account which holds client money belonging to more than one client. Client monies are held separately from Halls Holdings Ltd own monies, are easily identifiable and immediately available. Within the **general clients' bank account**, each client's money is recorded in individual client ledgers to maintain segregation of funds. Client money is held in an appropriate banking institution with a minimum rating of BBB+, regulated and authorised by: • **The Financial Conduct Authority (FCA)**
Access to Funds	Account signatories are at Director level. Only a Director of the firm can authorise new signatories to client money accounts. Authorised accounting staff can process payments with only Director level releasing these payments.
Timescales for Payment of Cash into a Client Account	All cash and cheques received by post are logged and banked on day of receipt, where possible, and allocated to the appropriate client money account. All unidentified funds are reviewed as soon as possible and no later than 1 month from receipt, at which time they will be allocated. Those that remain unidentified will continue to be investigated or returned.
Controls for Authorisation of Payments from a Client Account	A withdrawal from a client account can only be made after a specific authority has been approved by a signatory in accordance with the bank mandate or an appropriate person in accordance with the firm's policies, procedures, and systems.

	Procedures include requirements for all payment requests to have supporting evidence that has been checked and authorised. This is to ensure an adequate segregation of duties in the client accounting function is in place to prevent data tampering within the payment process.
How Interest & Bank Charges are Handled	The Client Bank Accounts are instant access accounts and Halls Holdings Ltd will cover transactional banking and account maintenance charges associated with the operation of such accounts. Halls Holdings Ltd is entitled to retain any interest earned through the aggregation of various client accounts to offset general bank charges and administration costs associated with the operating of the Client Bank Accounts.
Reconciliation of Accounts	Bank accounts are reconciled on a monthly basis, using a three-way reconciliation between the bank, general ledger, and individual client ledgers, as required by the RICS.
Information Provided to Clients About Monies Held on Their Account	Reporting and frequency requirements are agreed and documented with the client and provided in line with the agreement.
Approved by:	Jon Quinn (Managing Director) and Andrea Llewellyn-Bell (Group Company Secretary & Operations Manager) on behalf of Halls Holdings Ltd and any trading name of Halls.
February 2026	