

We operate AML/KYC policies in line with global regulatory standards and on a risk-based approach. We require varying levels of due diligence dependent upon the client’s risk category. We consider all professional investors to be high risk.

We have put this guide together to assist you in obtaining the required AML/KYC documentation from your client dependent on the risk category assigned to their occupation and nationality and/or residence.

No monies should be sent to us until we have completed our checks on the client and accepted them.

## Applicable to all clients

Detailed below are the typical and acceptable documents for confirming a client’s identification and address. One document cannot be used as evidence for both ID and address. All documents provided **must** be clear and legible.

Account Type	Acceptable evidence of Identification	Acceptable evidence of address
<b>Individual or jointly held accounts.</b> (For joint accounts evidence is required for each joint holder)	<ul style="list-style-type: none"> <li>&gt; A current (within 6 months of expiry) photograph bearing passport</li> <li>&gt; National Identity Card</li> <li>&gt; A current (within 6 months of expiry) photograph bearing driving license</li> <li>&gt; EEA member state identity card</li> <li>&gt; Firearms or shotgun certificate</li> <li>&gt; Residence permit issued by the Home Office to EEA nationals on sight of own country passport</li> </ul>	<ul style="list-style-type: none"> <li>&gt; A utility, gas, electric, water or telephone landline, rates or council bill dated within 3 months</li> <li>&gt; A state pension or government benefits book</li> <li>&gt; A tax assessment document</li> <li>&gt; A bank or bank credit card statement dated within 3 months</li> <li>&gt; Proof of home ownership or a rental agreement or a mortgage statement</li> <li>&gt; A current (within 6 months of expiry) photograph bearing driving license</li> </ul>

All documents **must** be certified by an authorized signatory as follows:

- > Certification of Identity: ‘True copy of the original and a true likeness of the person’ or equivalent.
- > Certification of Address: ‘True copy of the original’ or equivalent.
- > All certifications must be signed, dated and have the firms stamp on them.

If the authorised signatory is a professional person or someone of standing in the community then they must be listed on/in a public register or the certificate must be accompanied by evidence of their standing in the community.

## High Risk Clients

Clients who are currently a resident in, born in, and/or nationals of the following jurisdictions, as well as clients within these jobs or industries, and politically exposed persons will be classified as high risk. If a client is classed as high risk then we will require a short form CV outlying occupations accruing pension rights, and details of the history of any transfer into the transferring scheme.

Please note that we reserve the right to request information in addition to the above at our discretion.

### High Risk Countries: Nationality, Residency or Place of Birth

Afghanistan	Haiti	Nauru	South Sudan
Belarus	Iran	Nicaragua	Sri Lanka
Burundi	Iraq	Niger	Sudan
Cambodia	Jordan	Nigeria	Syria
Central African Republic	Kiribati	Niue	Trinidad and Tobago
Chad	Kosovo	North Korea	Tunisia
Congo (DRC)	Lao Peoples Democratic Republic	Northern Cyprus	Turkey
Crimea & Sevastopol	Lebanon	Pakistan	Turkmenistan
Cuba	Liberia	Palestine	Tuvalu
Djibouti	Libya	Panama	Ukraine
Equatorial Guinea	Mauritania	Russia	Vanuatu
Eritrea	Micronesia	Serbia	Venezuela
Ethiopia	Moldova	Russia	Western Sahara
Guinea-Bissau	Montserrat	Serbia	Yemen
Guinea-Conakry	Myanmar	Somalia	Zimbabwe

## High Risk Occupations:

- > Advocates/law firms/Attorneys Or Any Company Or Individual Connected In Providing Legal Services
- > ATM Service Providers
- > Vehicle Sales
- > Call Centres
- > Auction Services And Websites
- > Construction Companies
- > Agricultural Companies/Farming Companies
- > Financial Firms/Accountants/Chartered Accountants
- > Churches Or Any Religious Organization
- > Convenience Store
- > Alcohol Stores Or Liquor Stores
- > Aircraft Dealers
- > Travel Agencies For Travel Websites
- > Money Transfer Services
- > Precious Metal/Jewellery Stores
- > Charity business
- > Online Pharmacy
- > Adult Entertainment
- > Crypto Currency
- > Dating Websites
- > Arms

## High Risk: Politically Exposed Persons (PEP)

- > Heads of State
- > Heads of Government
- > members of national government or of the European Commission
- > Members of a national parliament or of the European Parliament
- > Members of governing bodies of political parties
- > Members of a supreme court, constitutional court or other high level judicial bodies
- > Members of a court of auditors
- > The Head or a member of the management board of a central bank
- > Ambassadors, charges d'affairs, general consuls and career consuls
- > General Officer or High Rank Officer in the armed forces
- > Members of administrative, management or supervisory bodies of a state
- > Heads of local authorities: presidents of general/regional councils, mayors of capital cities or of large regional cities having 100,000 inhabitants
- > Senior Officers in the police force
- > Senior post-holders in the judiciary system
- > Senior national and regional civil servants
- > National trade union representatives

Clients who are affiliated with a politically exposed person, an individual or close family or friend who is entrusted with prominent public functions.

- > A family member of a PEP includes a spouse or civil partner, child of the PEP and their spouses or civil partners, and parents of the PEP.
- > A known close associate of a PEP means an individual known to have joint beneficial ownership of a legal entity or any other close business relationship,
- > An individual who has sole beneficial ownership of a legal entity known to have been set up for the benefit of the PEP.
- > We run detailed checks that will identify if a potential applicant is registered as a PEP.