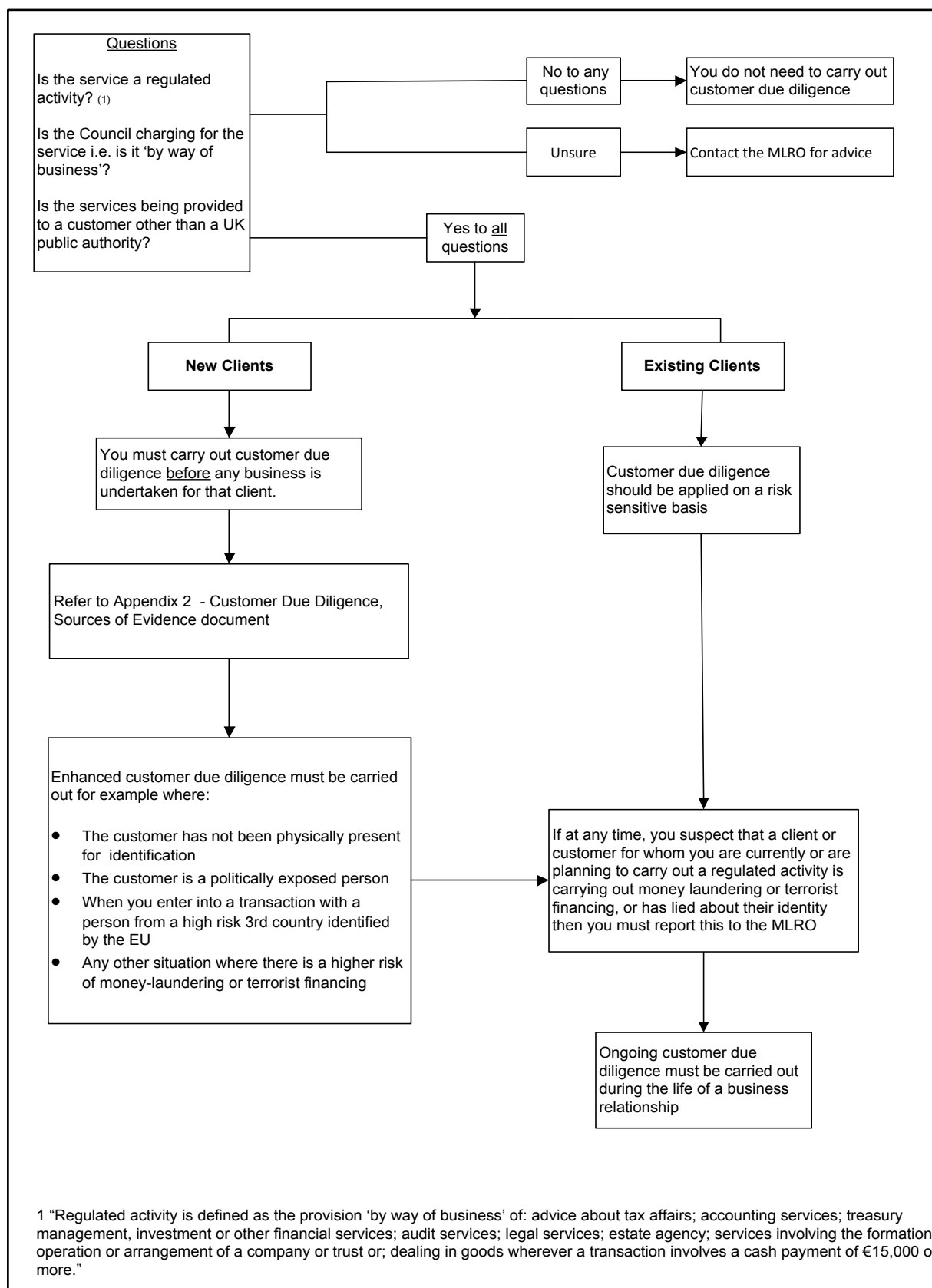


# ANTI-MONEY LAUNDERING

## CUSTOMER DUE DILIGENCE

### PROCEDURE



Set out below are examples of risk-based verification for some of the more common client types.

## A. Individuals Met face to face?

<b>Yes and normal risk – obtain:</b> <ul style="list-style-type: none"> <li>• either: proof of identity – photo identity or;</li> <li>• proof of identity – non-photo identity and proof of address (Please note P.O. Boxes are not acceptable addresses) or date of birth (can be electronic)</li> </ul>	<b>No and/or higher risk – obtain:</b> <ul style="list-style-type: none"> <li>• either: proof of identity – photo identity and an additional piece of evidence</li> <li>• or: proof of identity – non-photo identity, proof of address (Please note P.O. Boxes are not acceptable addresses) or date of birth Plus: an additional piece of evidence</li> </ul>
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(List 1) Evidence of identity	(List 2) Evidence of address or date of birth
<b>Acceptable photo identity</b> <ul style="list-style-type: none"> <li>• valid passport; or</li> <li>• valid photocard driving licence (full or provisional); or</li> <li>• national identity card (non-UK nationals issued by EEA member states and Switzerland); or</li> <li>• identity card issued by the Electoral Office for N. Ireland</li> </ul> <b>Acceptable non-photo evidence:</b> Documents issued by a government department, incorporating the person's name and residential address or their date of birth, e.g: <ul style="list-style-type: none"> <li>• a current UK full driving licence old version (not provisional licences); or</li> <li>• evidence of entitlement to a state or local authority funded benefit (including housing benefit and council tax benefit), tax credit, pension, educational or other grant; or</li> <li>• documents issued by HMRC, such as PAYE coding notices and statements of account (NB: employer issued documents such as P60s are not acceptable); or</li> <li>• end of year tax deduction certificates.</li> </ul>	<ul style="list-style-type: none"> <li>• instrument of a court appointment (such as a grant of probate, bankruptcy); or</li> <li>• current council tax demand letter or statement; or</li> <li>• current (within the last 3 months) bank statements, or credit/debit card statements issued by a regulated financial sector firm in the UK, EU or JMSLG equivalent jurisdiction (but not those printed off the internet); or</li> <li>• a file note of a visit by a member of the Council to the address concerned ("home visit"); or</li> <li>• an electoral register search showing residence in the current or most recent electoral year); or</li> <li>• a recent (last available) utility bill (gas, water, electricity, telephone – <b>not</b> mobile 'phone bills); it must be a bill or statement of account (<b>not</b> correspondence); or</li> <li>• valid photocard driving licence (full or provisional); or</li> <li>• a current UK full driving licence old version (<b>not</b> provisional licences); or</li> <li>• evidence of entitlement to a state or local authority funded benefit (including housing benefit and council tax benefit), tax credit, pension, educational or other grant; or</li> <li>• documents issued by HMRC, such as PAYE coding notices and statements of account (NB: employer issued documents such as P60s are not acceptable); or</li> <li>• or a solicitor's letter confirming recent house purchase or land registry confirmation (you must also verify the previous address).</li> </ul>

## B. Entities

### i. Private company/LLP Met a representative face to face?

<p><b>Yes and normal risk – obtain:</b></p> <p>Full company search from a national companies registry (or equivalent information obtained through a commercial provider of registry information)</p> <p>Or:</p> <p>Certified copies of taken from original documents evidencing details of incorporation or registration, registered office and list of directors and shareholders/members</p> <p>Identify any shareholder/member in the entity holding more than 25% of the equity (rights to either income, capital or voting), or if there is no holding over 25%, where considered appropriate on a risk sensitive basis, the largest holding.</p> <p>Repeat step above until appropriate ultimate beneficial owners have been identified.</p>	<p><b>No and/or higher risk – obtain:</b></p> <p>Select individual(s) and entities that is/are capable of exercising significant influence over this entity either as an appointed director, or as a shadow director or equivalent, <b>identify</b> it/them according to whether a legal or natural person.</p> <p>Select any shareholder/member in the entity holding more than 25% of the equity (rights to either income, capital or voting), or where no holding over 25%, the largest holding <b>and identify</b> it/them according to whether a legal or natural person</p> <p>Repeat step above until appropriate ultimate beneficial owners have been verified.</p> <p>For all entities, if a money service business, verify HMR&amp;C registered number (obtain certified copy of certificate or call HMR&amp;C National Advice Service on 0845 0109000, Opt. 3)</p>
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### ii. Listed or regulated entity

Obtain either a printout from the relevant regulator's or exchange's web-site (and annotate), or obtain direct written confirmation from the regulator or exchange, confirming the regulated or listed status of the entity (ensure basic details of name, address, any membership or registration details, and any disciplinary details where applicable are provided).

### iii. Government or similar bodies

Obtain and annotate evidence to confirm the body's:

- main place of operation; and
- the government or supra-national agency controlling it (government and supranational agency web-sites are a useful source of information)
- for Housing Associations, the printout must contain its registered number, registered company number (where appropriate) and registered address

For Listed/regulated entities and Government/similar bodies, additional verification steps are not generally considered necessary in such cases, as these entities in the UK qualify for application of simplified due diligence.

### iv. Money Service business

Verify HMR&C registered number (obtain certified copy of certificate or call HMR&C National Advice Service on 0845 0109000, Opt. 3).