

Good Company Wealth Limited

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Private & confidential

This document is prepared by Edale UK Management Ltd for Good Company Wealth Limited.

Overview

As part of our regulatory requirements we are obliged to conduct Client Due Diligence (“CDD”) on all clients.

This document is designed as a practical guide in obtaining the necessary CDD information from clients.

How to use this document

The CDD information required is determined by the type of client, their place of residence or registration and the value of the investment. For ease of reference we have separated corporate and individual clients into two tables which set out the CDD requirements.

To assist you in categorising your client risk, please see Country Risk Ratings on page 5 of this document.

This practical guide is designed in thew easy-to-follow steps.

Step 1	Verify ID & Residential Address of a Natural Person OR Verify ID of a Legal Person
Step 2	Verify Source of Funds/Wealth
Step 3	Certify documents

Step 1 – Verification

On these pages you will find the types of documents required to verify the identity of your client.

Client is a Legal Person		
	REGULATED & REGISTERED IN RISK CATEGORY 1 (ONLY THE BELOW REQUIRED)	REGISTERED BUT NOT REGULATED IN RISK CATEGORY 1, OR REGULATED & REGISTERED IN RISK CATEGORY 2 OR 3 (ALL OF THE BELOW REQUIRED)
COMPANY	<ul style="list-style-type: none"> Regulatory body ref. no. Copy of Authorised Signatory List 	<ul style="list-style-type: none"> Details of the names of all directors (in the case of a privately owned company, shareholder information will be required where 25% and above is held) Copy of Certificate of Incorporation Copy of Regulatory Licence (if any) Copy of Memorandum & Articles of Incorporation Principal place of business and where the business operates (eg: other jurisdictions) CDD upon the directors and shareholders who hold 25% and above) (see Client is a Natural Person section)
PARTNERSHIPS	<ul style="list-style-type: none"> Regulatory body ref. no. Copy of Authorised Signatory List of General Partner or equivalent 	<ul style="list-style-type: none"> Legal name of partnership Registered address of the partnership Principal place of business and where the business operates (eg: other jurisdictions) Copy of Regulatory Licence (issued by regulatory body) Copy of Partnership Deed Full CDD upon the individuals listed on the authorised signatory list (see Client is a Natural Person section) <ul style="list-style-type: none"> Where the General Partner is a corporate, it will be necessary to provide CDD upon shareholders who hold 25% and above
TRUSTS		
CORPORATE TRUSTEE	<ul style="list-style-type: none"> Regulatory body licence ref. no. Copy of Authorised Signatory list of the Trustees 	<ul style="list-style-type: none"> Copy of Regulatory Licence (issued by regulatory body) Copy of the Certificate of Incorporation Copy of the Memorandum and Articles of Association Copy of the Authorised Signatory List Copy of Deed of Appointment CDD upon the Trustees (see Client is a Natural Person section)
INDIVIDUAL TRUSTEE	<ul style="list-style-type: none"> Regulatory body licence ref. no. Deed of Appointment Confirmation of Signatory(ies) 	<ul style="list-style-type: none"> Copy of Regulatory Licence (issued by regulatory body) Copy of Deed of Appointment Confirmation of Signatory(ies) CDD upon the Trustee (see Client is a Natural Person section)

SETTLORS, BENEFICIARIES AND PROTECTORS	For Settlers and Beneficiaries with a vested interest and appointed Protector please refer to Client is a Natural Person section.
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Client is a Natural Person			
IDENTIFICATION INFORMATION OR EVIDENCE	Passport Number	Passport Number	One of the following: Passport Driving Licence National ID
RESIDENTIAL ADDRESS INFORMATION OR EVIDENCE	Permanent Residential Address	One of the following: <ul style="list-style-type: none"> • A copy of Utility Bill (Water/ Electricity) • Rates/Council Tax Statement • Government correspondence (eg: National Insurance/ Social Security or Income Tax Statement) • Letter from a recognized public authority or public servant verifying residence of the client(s) • Residence Visa + Copy of Rental/Lease Agreement • Driving Licence (valid and bearing residential address) 	One of the following: <ul style="list-style-type: none"> • A copy of Utility Bill (Water/ Electricity) • Rates/Council Tax Statement • Government correspondence (eg: National Insurance/ Social Security or Income Tax Statement) • Letter from a recognized public authority or public servant verifying residence of the client(s) • Residence Visa + Copy of Rental/Lease Agreement • Driving Licence (valid and bearing residential address)
EVIDENCE / INFORMATION RELATING TO SOURCE OF FUNDS	Investment Amount Below: £500K – Profession/Job Title Investment Amount Above: £500k – Documentary Evidence Required - see Evidencing the SOF and SOW section		
EVIDENCE OF SOURCE OF WEALTH	Only required if client is a Politically Exposed Person (PEP) - see Evidencing the SOF and SOW section All PEPs will be required to provide both (1) Evidence of ID and Residential address, and (2) Source of Funds and Source of Wealth)		

Step 2 - Source of Funds and Source of Wealth

All clients are required to provide information relating to the source of the funds that will be invested.

Depending upon the Risk Category of a client's profile, it may be necessary for clients to provide documentary evidence. Please see Country Risk Ratings section to identify the client's risk category.

Source of Funds ("SOF") is the activity which generates the funds associated with this investment (eg: client's occupation/ business activities, redeeming an insurance product or transferring a pension).

Source of Wealth ("SOW") is distinct from SOF and describes the activities which have generated the total net worth of the client, not just the funds associated with this particular investment (this could be in the form of an inheritance or other business activities). SOW evidence will always be required for clients with a high risk profile, for example Politically Exposed Persons ("PEPs").

It may be the case that the client's SOF and SOW are the same.

Evidencing the SOF and SOW

The below table details examples of any one (1) of the following that may be provided. Please note that all submitted documents must be certified. More information on the certification process can be found in the Certifying Documents section.

Description	Documentary evidence required
Company Sale	<ul style="list-style-type: none"> Copy of Share Sale Agreement Copy of Letter/Statement confirming the sale from either a solicitor/lawyer and/ or accountant (regulated)
Inheritance	<ul style="list-style-type: none"> Copy of media coverage (as supporting evidence) Grant of Probate which must include the value of the estate
Property Sale	<ul style="list-style-type: none"> Signed Letter from solicitor/lawyer Copy of the Sale Contract/Agreement Copy of Letter/Statement confirming the sale from either a solicitor/lawyer and/ or accountant (regulated)
Income	<ul style="list-style-type: none"> Original copy of recent payslip (or bonus payment) Latest set of Audited Accounts (if self-employed) Bank Statement clearly showing receipt of the most recent 3 months regular salary payments from named employer
Savings	<ul style="list-style-type: none"> Employer letter confirming annual salary from HR Manager or equivalent from firm Copy of bank statements covering a 3 month period which shows total savings from accumulated wealth. If the statement does not evidence the accumulation, please supply one of the listed documents (eg: if savings is from income, supply one of the required documents from the income section)
Share Sale	<ul style="list-style-type: none"> Copy of the sale document
Investment	<ul style="list-style-type: none"> Copy of the Contract Note(s) Investment Certificates, Contract Notes or Statement(s) Confirmation from relevant investment company
Loan	<ul style="list-style-type: none"> Bank statement(s) showing receipt of payment by investment company name Signed letter detailing payments from regulated accountant/solicitor or lawyer Confirmation letter from loan provider Recent Loan Statement

Distribution (eg: Trust; Company or Foundation)	<ul style="list-style-type: none"> Copy of a letter from the principals of the entity confirming that you are a beneficiary and in what capacity they are acting together with a copy of the portfolio valuation or similar reflecting the sum distributed
Win	<ul style="list-style-type: none"> Letter from relevant organisation (lottery HQ, betting shop or casino) Bank statement(s) showing funds deposited by company name
Maturing Investment(s) (eg: Policy/Pension Transfer)	<ul style="list-style-type: none"> Copies of media coverage as supporting evidence Letter from previous product provider regarding notification of proceeds of claim
Compensation Settlement	<ul style="list-style-type: none"> Closing statement from previous product provider Letter/Court Order from compensating body Signed Letter from Solicitor/Lawyer confirming the amount awarded to you in settlement (regulated)
Divorce Settlement	<ul style="list-style-type: none"> Letter/Court Order from compensating body Signed Letter from Solicitor/Lawyer confirming the amount awarded to you in settlement (regulated)
Gift	<ul style="list-style-type: none"> Identification of the Grantor (even if this is coming from their account) Letter from Grantor explaining the gift and source of their wealth
	<ul style="list-style-type: none"> Documentary evidence as to the grantor's source of wealth as detailed in this table

Country Risk Ratings

The following risk ratings are based on evaluations conducted by international bodies such as Transparency International and the Financial Action Task Force (FATF). The evaluations are based on each country's reported level of financial crime risk.

Risk Category 1		
United Kingdom and British Isles		
United Kingdom	Channel Islands (Jersey, Guernsey, Alderney)	Isle of Man

Risk Category 2				
Americas	Asia Pacific	Western Europe		
United States	Australia	Austria	Gibraltar	Norway
Canada	Hong Kong	Belgium	Liechtenstein	Poland
Cayman Islands	Singapore	Denmark	Luxembourg	Slovenia
	New Zealand	Finland	Malta	Switzerland
		France	Netherlands*	Sweden
		Germany		

* excluding Aruba, Bonaire, Curacao, Saga, St Eustatius & St Maarten

Risk Category 3				
Americas	Asia Pacific	Middle East & North Africa	Sub-Saharan Africa	Eastern Europe & Central Asia

Bahamas	Bhutan	Bahrain	Benin	Boznia & Herzegovina	Hungary
Barbados	Brunei	Israel	Botswana	Croatia	Ireland
Brazil	China	Jordan	Burkina Faso	Cyprus	Lithuania
Chile	India	Kuwait	Cape Verde	Georgia	Portugal
Colombia	Korea (South)	Oman	Djibouti	Greece	Romania
Costa Rica	Malaysia	Saudi Arabia	Ghana	Italy	Spain
Dominica	Mongolia	Tunisia	Liberia	Iceland	
El Salvador	Sri Lanka	Morocco	Lesotho	Latvia	
Jamaica	Taiwan	Qatar	Malawi	Madedonia	
Panama	Thailand	United Arab Emirates	Namibia	Moldova	
Peru			Rwanda	Montenegro	
Puerto Rico			Sao Tome & Principe	Serbia	
St Vincent & Grenadines			Senegal	Slovakia	
St Lucia			Seychelles	Turkey	
Suriname			Swaziland	Bulgaria	
Trinidad & Tobago			South Africa	Czech Republic	
Uruguay			Mauritius	Estonia	

Step 3 - Certifying documents

Please be aware that all documentation will need to be certified. The following individuals are permitted to certify evidence of documentation:

- A member of the Judiciary, a senior civil servant or a serving police or customers officer
- An officer of an embassy, consulate or high commission of the country of issue of the document as evidence of identity
- An individual who is a member of a professional body that sets and enforces ethical standards
- An individual that is qualified to conduct certification services under authority of the Certification and International Trade Committee (eg: Chamber of Commerce)
- A Director, officer or manager of a regulated financial services business which is operating in a well-regulated country or territory or of a branch or subsidiary of a group headquartered in a well-regulated country or territory which applies group standards to subsidiaries and branches world-wide and tests the application of and compliance with such standards.

The certifier must state, **“I hereby certify that this document is a true copy of the original”** and must sign and print their name, state their company name, their position within the company and the date.

If you have any questions about the information contained in this document, please contact us as per below:

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