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| **Client Due Diligence Form*****(Organisations)*****To be used if the client is a company, trust or other entity or if we are instructed by someone other than the client.** |  |
| **Who is the client?**  |
| **Full name, address, date of birth.** **Or company details, etc.** |  |
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| **Type of legal entity** |  |
| **Nature of the work we are to undertake** |  |
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|[ ]  I attach a certified copy of documents verifying their identity. |

***or***

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|[ ]  The client’s identity is already known to, and has been verified by, the firm |

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| **Who is the person actually instructing the firm?**  |
| **Full name, address, date of birth of person instructing the firm** |  |
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|[ ]  I have identified the person(s) named and verified their identity on the basis of documents or information from a reliable and independent source. **I attach certified copies.** |

***or***

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|[ ]  I have verified that they are authorised to instruct us on behalf of the client. |

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| **Beneficial owners**  |
| **Full name(s) or description** |  **Role or interest, address, date of birth.** |
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|[ ]  I attach a certified copy of documents verifying their identity, plus corporate structure. |

***or***

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|[ ]  Their identity is already known to, and has been verified by, the firm |

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| **Other checks** |
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|[ ]  I have made **reasonable enquiries** to understand the ownership and control structure of the client. |
|[ ]  I am satisfied that neither the client nor other relevant person is a **politically exposed person**, nor a family member or known close associate of a PEP |
|[ ]  I have made suitable enquiries, including where appropriate, as to the **source of funds** to be used, to assess money laundering risk and attached documentation where relevant |
|[ ]  There is **no need for a sanctions check** in this case **OR** I attach the results of a sanctions check. |

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| **Money Laundering Risk Assessment** |
| I assess the current money laundering risk as: |
|[ ]  **Low** |
|[ ]  **Medium** |
|[ ]  **High** |
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| **Signed** |  | **Date** |  |

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| **Notes for guidance**1. **The client:**

**Unlisted Companies & LLPs:** For UK entities use a Companies House search and client enquiries to obtain the registered company name/number, registered office address, the law to which it is subject, and its articles of association or other governing documents, the full names its directors (or members of other management body) and senior persons responsible for operations, its PSC Register (Register of People with Significant Control). To check beneficial owners of a company or LLP, you cannot just rely on the PSC register. You will normally need to get in touch with those named to ask them to confirm in writing that they agree the register is accurate, and to verify their identity.**Partnerships:** To check the client, for well-known, reputable firms where there is substantial public information about them the following information should be sufficient: (a) name, (b) address and (c) nature of business. To check the beneficial owner of a partnership, note that the definition includes any individual who (a) ultimately is entitled to or controls more than 25% of the capital or profits or more than 25% of the voting rights; or (b) otherwise exercises control over the management of the partnership.**Trusts:** To check the client, you will normally require:* information about the settlor and the source of wealth used to fund the trust
* the trust deed
* any document such as a letter of wishes relating to the trust referred to therein
* a copy of the “accurate and up-to-date records” of beneficial owners which trustees must maintain
* evidence that the trustees have properly registered details of the trust’s beneficial owners with the Trusts Registration Service (where required)
* evidence of the identity of the trustee instructing you, and possibly all trustees.

**Estates in course of administration:** Only the executor or administrator is a beneficial owner. There is no need to verify the beneficiaries.1. **Person instructing the firm:** Where someone purports to act on behalf of the client, we must verify that they are authorised to do so, as well as verifying their identity. This includes a director acting on behalf of their own business.
2. **Beneficial owners:** What evidence you need to verify the identity of beneficial owners depends on the risk level. Attach a diagram showing the ownership and control structure of any company, trust or other entity.
3. **PEP:** You must make enquiries to determine whether the client or a beneficial owner may be a PEP or family member or known close associate of a PEP. A PEP is someone entrusted with prominent public functions other than as a middle ranking or more junior official. You may not accept a PEP as a client without approval from the firm’s MLRO.
4. **Source of funds:** You must know your client and understand the nature of the matter. Your enquiries should include, where appropriate, asking about the source of any funds to be used, to ensure they are consistent with what you know about the client
5. **Sanctions:** If the client or third party involved in a financial transaction has a link to a foreign jurisdiction where government sanctions might be in place, notify the MLRO who will decide what checks are appropriate.
6. **Risk assessment:** Simplified due diligence may be appropriate for low-risk clients, e.g. a listed company, public body, financial institution or regulated professional firm. Enhanced due diligence checks must be completed in high-risk cases. In high-risk cases seek approval from the MLRO before proceeding.
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