ANTI-MONEY LAUNDERING AND SOURCE OF WEALTH REQUIREMENTS



The information in this document is correct as at March 2024 and is subject to change. All references to 'Utmost International', 'we', 'us' and 'our' in this document mean Utmost International Isle of Man Limited. For further information or assistance, contact our Customer Service team or visit our website: www.utmostinternational.com

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IDENTIFICATION REQUIREMENTS

Under Isle of Man Anti-Money Laundering regulations we are required to verify the identity and residential address of all parties linked to a bond. Below you will find the standard minimum requirements in some instances we may request additional information.

All documents, including those provided to evidence source of funds or wealth, must be original or certified copies of the original. For more information on these requirements, refer to the 'Certifying Documents' section of this document.

INDIVIDUAL CLIENTS

We require one form of identity verification and one form of address verification for each client, suitable documents are listed below.

Identification verification

- Current valid passport All details on the picture page of the passport must be clear, including the photograph and the full two lines of digits at the bottom of the page. If the passport bearer's signature is on a separate page, a copy of that page is also required.
- National identity card Carrying a photograph of the individual.
- Driving Licence Current valid driving licence issued in a recognised jurisdiction4 bearing a photograph of the individual. Where the driving licence does not confirm nationality this will be requested.

Address verification (residential address, PO Box address is not acceptable)

- A recent³ utility, rates or council tax bill (this must show the residential address) (Mobile phone bills are not acceptable).
- A recent³ mortgage statement from a regulated⁴ lender, confirming the residential address.
- A current photographic driving licence which must not have been used as the sole document to verify identity and must include the current residential
- A state pension benefit or other government produced document showing benefit entitlement.
- A recent³ tax assessment document correspondence from an official independent source such as central or local government department or agency in a recognised jurisdiction4.
- A recent³ account statement from a regulated⁴ bank, building society or credit card company. This must show the residential address and have a closing balance above 0. (Store cards are not acceptable)
- Current UK products include but are not limited to PWP UK, Selection, Delegation, Evolution, Generation Planning Bond and the Estate Planning Bond. Policyholders of any ex-AXA products should also use this number.
- Current Rest of the World products include but are not limited to Executive Investment Portfolio, Managed Capital Account, Life Insurance Portfolio, Life Insurance Portfolio Plus, Executive Bond (Life and Redemption), International Investment Bond (Redemption), Executive Investment Plan, Executive Investment Account, Silk Life Plan (Life Cover Only), Silk Life Plan (Life Cover Plus). Policyholders of any ex-Quilter products should also use this number.
- Recent generally means not more than six months old, if issued on a monthly basis. If the document is issued less frequently, e.g. annually, recent means the most recently issued document (for example mortgage statements are usually issued annually).
- recognised jurisdiction means a jurisdiction based and regulated in a low risk Country as per Country Risk Ratings outlined in this document.

CORPORATE CLIENTS

There are different identification requirements depending on whether the corporate client is publicly listed or privately traded. The required documents for each are set out below, in addition to providing confirmation that the company has not been or is not in the process of being dissolved, struck off, wound up, or terminated. **All documentation must be suitably certified.**

Public companies

(listed on a recognised stock exchange)

- A copy of the Certificate of Incorporation, Company Memorandum and Articles of Association.
- Evidence of the registered office of the Company.
- An authorised signatory list.

Public and private companies

(not listed on a recognised stock exchange)

- A copy of the Certificate of Incorporation, Company Memorandum and Articles of Association.
- > Evidence of the registered office of the Company.
- A list of all directors, and verifications of identity and address of at least two, one of whom must be an executive director.
- A copy of the latest annual reports and accounts.
- > An authorised signatory list.
- A list of all shareholders holding 25% or more of the issued share capital, and verification of their identity and address.

TRUST CLIENTS

The appropriate identity verification requirements are explained below all documentation must be suitably certified. We must understand the:

- > Nature and Purpose of the Trust.
- > Structure of the Trust arrangement.
- > Date of Trust Establishment.
- > Name of the Trust.

Trustee verification corporate

> If the client is a corporate trust, the **corporate** identification requirements stated above apply in addition to the trustee requirements.

Trustee verification individual

If the client is an individual trustee, the **individual** identification requirements stated above for each party to the trust apply, including the settlor if they are a controlling person. In addition to the individual identification requirements, we require a copy or extract of the trust deed showing proper appointment of the trustees. The nature and purpose of the trust must also be provided.

Settlor verification

- Existing trusts require confirmation within the application form of: client name, residential address, and date of birth. If the settlor is deceased then date of death is also required. Verification documents are only required when the Settlor is a controlling person of the trust.
- > New trusts require verification of the settlor at outset. The **individual** identification requirements as stated above apply.

CERTIFYING DOCUMENTS

All copies of documents such as those submitted as evidence of identity, address, source of funds, or source of wealth must be certified by a suitable certifier. Any certified copy must be of the original document; previously certified copies cannot be copied again.

A suitable certifier may be one of those listed below; provided we can verify their status. A certifier should not have any conflict of interest (e.g. must not have any link to the contract, or be related to the individual).

Certifications must be clear, legible and bear the signature of the certifier. The suitable certifier should state:

- on a proof of identity document: 'I hereby confirm that this document is a true copy of the original which I have sighted and the photograph represents a good likeness of the client who I have met.'
- on other documents, for example address verification: 'I hereby confirm that this document is a true copy of the original which I have sighted.'

and include the following details, relating to the certifier:

- > Signature of certifier.
- > Full name and position/job title of the certifier which should be printed in block capital.
- > Company name and address.
- Any additional details such as membership number from a regulated body.
- > Contact details of the certifier to include email and phone number.
- > Date of certification.
- > If a document has multiple pages the certification on the first page should state the total number of pages in the document.

CERTIFICATION OF DOCUMENTS OBTAINED OVER VIDEO CALL

Documents provided through non face-to-face means including via live video screen may be accepted and must include the following certification wording: 'I certify this document as a copy of the document that I have seen through <insert method of communication used> held on <insert date> between me and the client. The document has not been tampered with and I have received the same confirmation from the client.'

The certifier must take a screenshot of the client with their documents (e.g. holding their passport to their face) for their own records. We reserve the right to request a copy of the screenshot held on the certifier's records.



For business submitted from Latin America or the Middle East we also require a screenshot, from the video call.

Suitable certifiers

- > A director or manager of an authorised credit or financial institution, regulated and supervised in a low risk jurisdiction⁵ (which we can verify).
- > A regulated6 introducer, or authorised employee of a regulated6 introducer who holds terms of business with Utmost International.
- > An active chartered accountant who is a member of a recognised professional body located in a low risk jurisdiction⁵ (which we can verify).
- A notary public, commissioner for oaths, lawyer or advocate who is a member of a recognised professional body which we can verify.
- > A formally appointed member of the judiciary, registrar or other civil or public servant, authorised to issue or certify copy documents.
- > An authorised representative of an embassy or High Commission of the country who issued the document.
- > An individual employed by an introducer who is not a regulated introducer and who has been approved in writing by Utmost International to act as a suitable certifier.

A certifier should not have any conflict of interest i.e. must not have any link to the contract or be related to the individual.

FOREIGN LANGUAGE DOCUMENTS

Documents that are not in English should be adequately translated so that the true significance of the document can be appreciated.

All verification statements must be written in English, as should the translator's name, job title, name of company and website address (if applicable). A copy of the translation should be accompanied by a copy of the original document.

It is important that we are able to verify the certification of documents. If you are unsure if your chosen certifier will meet our requirements, contact our Customer Support team who will be able to provide further guidance.

POWER OF ATTORNEY (POA) CERTIFICATIONS

Any copies of power of attorney documents must:

- > State at the end of the document that the copy is a true and complete copy of the entire original document
- > Have each page signed and certified as a true and complete copy of the original page.

It can be certified by:

- A solicitor / advocate.
- A notary public.
- A stockbroker.

⁵ **low risk jurisdiction** means a low risk Country as per the Country Risk Ratings outlined in this document.

⁶ Based and regulated in a low risk Country as per Country Risk Ratings outlined in this document.

SOURCE OF FUNDS AND SOURCE OF WEALTH REQUIREMENTS

The following source of funds information is applicable when completing a new business application or when source of funds information has been specifically requested by us.

All Isle of Man life companies are required by law^7 to make enquiries as to how a client has acquired the monies to be invested.

For more information regarding our source of wealth requirements, contact us using the relevant details on the front page.

SOURCE OF FUNDS

Source of funds describes the activities that have generated each client's funds, for example, employment, business activities, proceeds of a house sale or corporate dividends received.

When a new business application is received, a risk assessment takes place. Utmost follows a risk based approach which means that evidence of the source of funds may be required, depending upon the assessment.

Failure to fully complete the source of funds and occupation section of the new business application form will result in requests for additional information, which may delay the processing of the application.

If a client is a Politically Exposed Person (PEP) or is connected to a PEP, source of funds and evidence must come from the **client's personal bank account**

ADDITIONAL SINGLE PREMIUMS

All investments are assessed on a case by case basis when an additional premium is applied for, so further source of funds and/or source of wealth information and documentation may be required.

SOURCE OF WEALTH

This requires Utmost International to be able to determine your client's entire body of wealth using reasonable measures. This requirement specifically applies to high risk clients and Politically Exposed Persons (PEPs). We do reserve the right to request this for any client at any time and may require documentary evidence of a client's source of wealth.

As part of global efforts to prevent financial crime, Isle of Man authorised life companies may adopt a risk-based approach when obtaining evidence of the source of a client's wealth. This does not question the quality of the investment, it is a safeguard that will benefit the industry as a whole and ultimately protect the client as an investor.

VERY HIGH RISK INDUSTRIES

Utmost International will not ordinarily accept business where the client is a controlling person (e.g. a director or shareholder) in one of the following industries. Nor will we ordinarily accept business where the client's source of funds and/or source of wealth was generated as a controlling person in one of these industries:

- Money Service business Money broking services and agents (including cheque cashing, foreign exchange / bureau de change, money transfer services).
- Gambling Casinos, online gambling, gaming, bookmakers and card clubs.
- > Dealers in precious metals, gemstones or jewellery / watch dealers.
- Arms Trade and Defence Arms related (including arms, ammunition, counter measures, military, defence equipment, goods, technology, and personnel; direct or indirect involvement in the manufacture, maintenance, sale, supply, delivery, transfer, purchase, import / export, transportation, financing / financial assistance, use of brokering services, training / technical assistance).

HIGH RISK INDUSTRIES

Where a client has previous or current links to any of the industries below and held / holds a controlling position (e.g. a director or shareholder), Utmost International will require evidence of source of funds in all cases. Depending on each client's specific role or function, in addition to evidence of source of funds, Utmost International may require information to establish and verify the client's source of wealth. Utmost International will contact you if Source of Wealth is relevant to the application.

- > **Construction** Construction / building / civil engineering.
- Pharmaceuticals and Healthcare Pharmaceutical goods and devices which are unlicensed (or without marketing authorisation in the jurisdiction where they are manufactured, marketed, sold or supplied).
- Decision making members of high profile sporting bodies - Elite professional sports (including players, managers, agents and governing bodies).
- Extractive industries Mining / drilling / quarrying for natural resources (including oil and gas).
- > **Public procurement** Contracted work for foreign governments.

⁷ Anti-Money Laundering and Countering the Financing of Terrorism Code 2019.

SOURCE OF FUNDS CATEGORIES

All copies of documents such as those submitted as evidence of identity, address, source of funds, or source of wealth must be certified by a **suitable certifier**.

SOURCE OF FUNDS CATEGORIES	EXAMPLES OF SUITABLE VERIFICATION DOCUMENTS	INFORMATION REQUIRED ON THE APPLICATION
Savings from employment income (including salary, bonus and fees)	 Last three months' payslips. Letter from their employer confirming income and bonuses for the last two years. The letter should be on the employer's letter headed paper and state the client's full name and residential address. It must be signed by the HR director/manager. Bank statements that clearly show receipt of the most recent three months' regular salary payments from the named employer. Latest audited accounts if self-employed. The accounts should make reference to the client's name; show the annual turnover, the balance sheet and the shareholder's funds. Tax statement e.g. P60 for UK, IRAS for Singapore etc. 	All of the following: Accumulated earned income amount incl. currency. Number of years income accumulated. Name of institution holding the funds. Details of account where earned income accumulated. Length of time funds have been held in the account. Main occupation during the accumulation period. Industry/Business sector. Name and address of employer. Average annual salary over the accumulation period. Average annual bonus over the accumulation period.
Compensation payment	> Letter or court order from compensating body or a solicitor's / advocate's letter. The above documents should be on the relevant letter headed paper, stating client's full name and residential address, date payment received, amount received, who the payment came from and the reason for it.	All of the following: > Who paid the compensation (i.e. name of organisation or individual - including divorce settlements). > Country in which compensation was awarded. > Reason for compensation. > Total amount received including the currency and amount. > Date received.
Competition win	 Letter from relevant organisation on their letter headed paper, stating the client's full name and residential address, date of win and value of winnings. Bank statements showing funds deposited by the named organisation. Copies of any media coverage would help as supporting evidence. 	All of the following: > The name of the organisation providing the winnings. > Description of competition. > Country competition was held. > Amount of winnings including currency. > Date of win.
Gift	of gift (amount, date given and reason) and acknowledging the source of the donated funds. The donor's full name and residential address should be included and confirmation of what their relationship is to the client. Please note the donor also needs to provide supporting documentation as per the provisions of this table to evidence where their source of wealth was accumulated.	 All of the following: Name, date of birth, nationality and residential address of the person who gave the gift. Relationship to applicant. Reason for the gift. Description of the gift. Total amount received including the currency and amount. Date received.

Inheritance	 Grant of Probate (with a copy of the will) which must include the value of the estate. Solicitor's letter. The letter should be on the solicitor's letter headed paper and include the full name and address of the client, the name of the person who left the inheritance, the relationship to the client, date and amount received. 	All of the following: Deceased's full name, relationship to applicant and date of death. Details of the assets forming the inheritance, e.g. cash, property, financial assets etc. Total amount received including the currency and amount. Date received. Solicitor/lawyer who dealt with the estate name and address.
Loan	 Loan agreement, stating the name and address of the client; date of the loan and how much it was for. It should be clear who the loan provider is. Recent loan statements dated within the last six months which show the client's name and address. 	All of the following: > Name of loan provider. > Address of loan provider. > Total amount and currency borrowed. > Date of the loan. > Purpose of the loan.
Maturing policy/policy claim/replacement policy/pension	> Letter or contract note from the previous investment company giving notification of proceeds of maturing investment. The documents must be on the relevant company's letter headed paper and must include the full name and residential address of the client; state the date the investment matured and the amount received.	All of the following: Name of and address of investment/ policy provider. Policyholders full name. Length of time policy held. Reason for policy claim or replacement policy (if applicable). Total amount received including currency and amount. Surrender penalty (if applicable). Date received.
Sale of asset portfolio or investment	Degal sale document, e.g. contract notes. The documents must state the client's name, where the shares were held, the date they were sold and how much was received.	All of the following: Description of asset portfolio or investments (e.g. government bonds, equities, etc). Name of company that held it (e.g. bank, stockbroker, insurance company, investment holding company or similar). Registered address of the company. Account name. Length of time asset portfolio or investment held. Date of sale. Net amount received from sale including currency.

Company sale or sale	> Signed letter from solicitor.	All of the following:
of interest in company	 Signed letter from regulated accountant. Copy of contract of sale and sight of investment monies on bank statements. The above documents should be on the relevant company's letter headed paper and should include the full name and residential address of the client; the company incorporation number; state the date the sale took place and the amount personally received. Copies of any media coverage would help as supporting evidence. 	 Name and registered address of the company sold. Industry/business sector. Connection to company (e.g. owner, partner shareholder etc). Date of sale. Currency and amount received for sale. Net amount received from sale.
Property sale	 Signed letter from solicitor. Completed sale contract. Both documents should include the address of the property sold, the client's full name, date of initial purchase, date sold and the sale amount. Note where the property sold was owned for less than five years you should also provide the information and evidence (where applicable) for the source of funds used to acquire the property. 	All of the following: Address of property sold (including postcode). Length of time property owned. Date of sale. Total sale amount. Net amount received from the sale.
Other income sources	 Appropriate supporting documentation. Signed letter detailing funds from a regulated accountant. The document should always be on the relevant letter headed paper and provide: the client's full name; residential address; information regarding the amount and date received; and information as to where the source of these funds have been derived from. 	All of the following: Description of the activities generating the funds. Role in relation to the activity. Period over which the activities occurred. Country in which the activity occurred. Date proceeds received. Total amount and currency of proceeds received from the activity.

CORPORATE INVESTORS (TRADING COMPANIES)

SOURCE OF FUNDS CATEGORIES	INFORMATION TO BE PROVIDED BY THE CLIENT FOR ALL APPLICATIONS
Company profits	 Copy of latest audited accounts. The accounts should show the annual turnover and the balance sheet and the shareholder's funds. A letter from a regulated accountant giving details of company profits over the last two years. This should provide full trading name and address of the company, confirmation of the annual turnover and the balance sheet and the shareholder's funds.

WHEN IS DOCUMENTARY EVIDENCE REQUIRED?

To enable us to determine whether documentary evidence is required, we apply a risk rating to all of your client's investments.

Utmost International reserves the right to request evidence of source of funds and source of wealth at any point and the below is for guidance purposes.

DETERMINING RISK RATING AND PREMIUM LEVELS

In order to determine what risk rating applies to your client's investment you need to take into account the following factors:

- your client's country of residence
- the country the premium is paid from.

To obtain an indication of the client's total risk rating, use the tables in the Country risk ratings section on pages 8 and 9 of this document to determine the score for the country of residence and country the premium is paid from. Add these two scores together to give the total risk rating.

If either of the countries has an N-rating then Utmost International cannot accept this business.

Once you have identified your customers' residence and funding risks, please refer to the following table to identify the threshold for documentary evidence based on your client's total risk rating. If the single or regular premiums are above the levels in the table for the total risk ratings shown, then you also need to make sure that the relevant documentary evidence accompanies the application form as detailed in this document.

TOTAL RISK RATING	SINGLE PREMIUM ⁸	REGULAR YEARLY PREMIUM?
2	>GBP1,000,000 / USD1,500,000 / EUR1,500,000	>GBP100,000 / USD150,000 / EUR150,000
3-4	>GBP400,000 / USD600,000 / EUR600,000	>GBP50,000 / USD75,000 / EUR75,000
5+	>GBP100,000 / USD150,000 / EUR150,000	>GBP24,000 / USD36,000 / EUR36,000

EXAMPLE

CLIENT'S COUNTRY OF RESIDENCE	COUNTRY THAT THE PREMIUM IS PAID FROM	TOTAL RISK RATING
United Arab Emirates (risk rating = 2)	UK (risk rating =1)	(3)

Based on the example above, if we assume your client is investing a single premium in US dollars, then you would need to provide further documentary evidence if the single premium is above USD600,000 or annualised premium is above USD75,000.

If your client is resident in and funding from and you are regulated in one of the following jurisdictions: Isle of Man, Jersey, Guernsey, Hong Kong, United Kingdom, Singapore or Sweden, the threshold for evidence increases to GBP2,000,000 for single premium and GBP120,000 a year for regular premiums (or currency equivalent).

This document is a guidance document and should not be used to determine where Utmost International can accept business from. Please contact the relevant Customer Service team if you have any questions.

These limits are cumulative. All Isle of Man insurers have a regulatory obligation when considering any application for a new policy or additional investment to take into account all previous investments made by a policyholder, regardless of when the investment was made.

COUNTRY RISK RATINGS

We have assigned a rating to a number of countries based on the evaluation carried out by international bodies, including the Financial Action Task Force (FATF). We have taken these evaluations and produced ratings based on each country's financial crime risk as shown in the following tables. The country ratings could be subject to changes in the future.

COUNTRY RISK RATING 1 (LOW RISK)					
Andorra	Cook Islands	Greece	Latvia	Netherlands	South Korea
Australia	Curacao	Guernsey	Liechtenstein	New Zealand	Spain
Austria	Czechia	Hong Kong	Lithuania	Norway	Sweden
Bahrain	Denmark	Iceland	Luxembourg	Portugal	Switzerland
Belgium	Estonia	Ireland	Macau	Saint Vincent and	United Kingdom
Bermuda	Finland	Isle of Man	Malaysia	San Marino	United States of America
British Virgin	France	Italy	Montserrat		
Islands	Germany	Jersey		Singapore	Uruguay
Canada				Slovenia	

COUNTRY RISK RATING 2 (MEDIUM RIS					
Albania	Brunei	El Salvador	Malta	Philippines	Trinidad and
Anguilla	Darussalam	Faroe Islands	Mauritius	Poland	Tobago
Antigua and	Burkina Faso	Georgia	Mexico	Qatar	Tunisia
Barbuda	Cayman Islands	Ghana	Monaco	Romania	Turkey
Argentina	Chile	Gibraltar	Montenegro	Samoa	Turks and Caicos
Armenia	China	Grenada	Morocco	Saint Lucia	Ukraine
Aruba	Colombia	Hungary	Nauru	Saudi Arabia	United Arab Emirates
Azerbaijan	Costa Rica	India	Niue	Senegal	United States
Bahamas	Croatia	Indonesia	North Macedonia	Seychelles	Virgin Islands
Barbados	Cyprus	Israel	Oman	Slovakia	Vanuatu
Belarus	Dominica	Jamaica	Pakistan	South Africa	
Belize	Dominican	Japan	Panama	St Kitts and Nevis	
Bulgaria	Republic _	Kazakhstan	Peru	Taiwan	
Brazil	Egypt		. 5. 5		

COUNTRY RISK RATING 3 (HIGH RISK					NG 3 (HIGH RISK)
Bangladesh	Ecuador	Jordan	Mongolia	Serbia	Uzbekistan
Bhutan	Fiji	Kenya	Namibia	Sri Lanka	Zambia
Botswana	Gabon	Kuwait	Nigeria	Tajikistan	
Cameroon	Guatemala	Kyrgyzstan	Northern Cyprus	Thailand	
Cape Verde / Cabo Verde	Guyana Honduras	Malawi Moldova	Papua New Guinea	Timor-Leste Uganda	
Cuba	Honduras	ivioladva	Paraguay	Oganda	

COUNTRY RISK RATING = 'N' (UTMOST INTERNATIONAL CANNOT ACCEPT BUSINESS FROM A CLIENT RESIDENT IN A COUNTRY RATED AS 'N' OR PREMIUM FROM AN INSTITUTION ESTABLISHED IN A COUNTRY RATED AS 'N')

Afghanistan	Côte d'Ivoire/	Guinea	Madagascar	Palestine	Syria
Algeria	Ivory Coast	Guinea-Bissau	Maldives	Puerto Rico	Tanzania
Angola	Democratic Republic of	Haiti	Mali	Republic of the	Togo
Antilles	Congo	Holy See / Vatican	Mauritania	Congo	Tonga
Benin	Djibouti	City	Mozambique	Russia	Turkmenistan
Bolivia	Equatorial Guinea	Iran	Myanmar	Rwanda	Venezuela
Bosnia and	Eritrea	Iraq	Nepal	Saint Helena	Vietnam
Herzegovina	Eswatini /	Kiribati	, Nicaragua	Sao Torne and	Western Sahara
Burundi	Swaziland	Kosovo	Niger	Principe	Yemen
Cambodia	Ethiopia	Laos	North Korea	Sierra Leone	Zimbabwe
Central African	Falkland Islands	Lebanon	Northern	Somalia	Ziiiibabwe
Republic	French Guyana	Lesotho	Marianas	South Sudan	
Chad	Gambia	Liberia	Palau	Sudan	
Comoros	Guam	Libya		Suriname	

A WEALTH Of DIFFERENCE

www.utmostinternational.com

Calls may be monitored and recorded for training purposes and to avoid misunderstandings.

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Utmost Wealth Solutions is registered in the Isle of Man as a business name of Utmost International Isle of Man Limited.
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