

# Customer Due Diligence

## A summary for our customers

### **What is customer due diligence?**

Customer due diligence – sometimes referred to as ‘know your customer’ – is a requirement placed on us by law to check the identity of our customers. Generally, we do this by collecting copies of identity documentation (for example, passports and utility bills). This legislation aims to help prevent money laundering, tax evasion, terrorist financing, and fraud within the financial services industry.

As your policy is an offshore Utmost PanEurope dac policy, we must meet the requirements of the Central Bank of Ireland. The Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended in 2013) obliges us to identify and verify all our customers. This means we must have up-to-date proof of address and a current photo ID on file for you when you ask for changes to your policy. We will also ask for further verification if you have set your policy up as a trust or corporate policy.

### **What does this mean for customers of Utmost PanEurope dac?**

We must check your identity when you take money out of your policy or make certain changes to it. Where there are beneficial owners, we must also check the identity of the beneficial owners. Beneficial Owners are persons who have control over the investment or stand to benefit from the investment.

There may be certain circumstances where we may have additional requirements over and above those listed in this document.

### **What documents will we accept?**

The following pages tell you the types of documents we usually accept for customer due diligence. This isn't an exhaustive list, but should give you a good idea of what we require. Your financial adviser will also be able to offer you help and guidance. Alternatively, you can contact our customer experience team with any questions you may have.

### **Requirements for certifying document**

For certified documents, please make sure the certifier confirms their full name, occupation, company stamp (where applicable) and contact details.

The certifier of a document must certify:

- they have seen original documentation verifying identity and/or residential address
- the copy of the document is a complete and accurate copy of the original, and
- any photo document verifying the identity of an individual bears a true likeness to the individual requesting certification or words to the same effect.

## 1. Customer due diligence for individuals

### Evidence of identity - we need a certified copy of one item from this list

- Current signed passport including cover, photo and signature page.
- Current full photo driving licence.
- Government issued national identity card.

You do not need to submit evidence of identity if the version we hold on file is still in date. If the version we hold on file is no longer in date, current certified evidence of identity will be required.

And

### Evidence of address - residential address only - we need a certified copy or an original copy of one item from this list

- Gas, electricity, water or phone bill (for a landline only) dated within the last six months.
- Mortgage/bank/building society statement (can be printed from the internet) dated within the last six months.
- Current photo card driving license showing current residential address (if not used for evidence of name).
- Home visit from your financial adviser within the last six months (confirmed on adviser headed paper, including details of address, who visited and the date of the visit).
- Evidence of entitlement to local authority funded benefit (for example, housing benefit, council tax benefit) dated within the last six months.
- Confirmation of tax credit dated within the last six months.
- State pension entitlement dated within the last six months.
- Certified copy of an electoral roll check dated within the last six months.

And

### Evidence of Bank details

If your payment is being made to an account that is different from where your premium originated or we have not paid to the account previously, we will require an original or certified bank statement (including an original printout of an online bank statement).

## 2. Customer due diligence for trusts

### We need these certified documents to verify a trust:

- Certified extracts from the trust deed showing appointment of trustees and execution of the trust deed.
- Certified customer due diligence (see section 1 above) for all current trustees. If you ask for a payment to a beneficiary, we will require certified customer due diligence for the beneficiary.
- If applicants are corporate trustees, they will have to meet both corporate and trustee requirements.
- Trustee applicants who are authorised trust companies in the UK, Channel Islands or Isle of Man are exempt from verification requirements once they provide us with:
  - their regulatory licence number
  - a print out from the website of the relevant regulatory body showing they are a regulated entity, and

- an original or certified copy of the most up to date authorised signature list. If the list we hold on file is over a year old, we must receive confirmation from the authorised signatory using the company's email address, that there have been no changes to the signatories. If there have been changes, please send us an updated authorised signatory list.
- If the trustees have changed since the original deed, we need to see the amendment deed either appointing new trustees or removing old trustees.

### 3. Customer due diligence for corporate bodies

We need these certified documents to verify a company:

Documents	Evidence
Certificate of incorporation	Certified copy of certificate of incorporation or a Companies House print out (UK, Channel Islands, Isle of Man) which must be dated within the last six months.
A list of directors' names	Companies House print out (UK, Channel Islands, Isle of Man) which must be dated within the last six months or a list of directors' names on company headed paper signed by the authorised signatory.
Authorised signatory list	Most up to date authorised signatory list. If the list we hold on file over a year old, we must receive confirmation from the authorised signatory using the company's email address, that there have been no changes to the signatories. If there have been changes, please send us an updated authorised signatory list.
Evidence of registered address of the corporate entity	Companies House print out (UK, Channel Islands, Isle of Man) which must be dated within the last six months. The same rules apply as in section 1 for individuals address verification.
Confirmation that the company is still in existence	Latest audited accounts or a Companies House print out (UK / CI / IOM) which must be dated within the last six months.
Share register	Certified copy of the share register or a Companies House print out (UK, Channel Islands, Isle of Man), less than six months old, outlining the shareholders.
Photo and address identification for two directors of the company	See Section 1 of customer due diligence for individuals.
Photo and address identification for two signatories (if different to above)	See Section 1 of customer due diligence for individuals.
Photo and address identification for any shareholder with a 25% or more interest in the company	See Section 1 of customer due diligence for individuals.

### 4. Requirement to have customer due diligence documents certified

Certifier	Details
Independent financial adviser	Name / Position / Role / Contact details: business email and phone number Company name Address Company stamp Signature Date

#### 4. Requirement to have customer due diligence documents certified continued

Certifier	Details
Practising chartered and certified public accountant	Name / Position / Role / Contact details: business email and phone number Company name (if applicable) Address Company stamp Signature Date Professional accountancy body membership number or equivalent
Police officer	Name / Position / Role / Contact details: business email and phone number Address Stamp Signature Date
Notary public	Name / Position / Role / Contact details: business email and phone number Address Signature Date Notary stamp Practice certificate with professional membership number
Practising solicitor	Name / Position / Role / Contact details: business email and phone number Company name Address Signature Date Company stamp Practising certificate with professional membership number
Embassy/Consular staff member	Name / Position / Role / Contact details: business email and phone number Address Signature Date Stamp
Branch official of a regulated financial or credit institution	Name / Position / Role / Contact details: business email and phone number Address Signature Date Stamp

We are required to check the regulated status of the certifier (for example, by reference to the FCA register or equivalent). Where that isn't possible, we'll require evidence of the certifier's regulated status from the client, adviser or certifier.

The certifier of a document must certify:

- they have seen original documentation verifying identity and/or residential address
- the copy of the document they certify is a complete and accurate copy of the original, and
- any photo document verifying the identity of an individual bears a true likeness to the individual or words to the same effect.

## How you can contact us

You can email us at  
client.services@utmostwealth.ie

You can call us on **0845 300 2114** (UK) or  
**(+353) 1 802 8494** (International). We are  
available between 8:30am and 5:30pm Monday  
to Friday. We record and monitor our calls to  
help us improve our service to you.

You can write to us at:  
**Utmost PanEurope dac**  
**Montague House**  
**Adelaide Road**  
**Dublin 2**  
**Ireland**

## A WEALTH *of* DIFFERENCE

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