

Anti-Money Laundering (AML) Guidelines

Monument International Fund Managers (IOM) Limited are regulated by the Isle of Man Financial Services Authority and subject to Isle of Man Anti- Money Laundering & Countering the Financing of Terrorism (“AML/CFT”) legislation and regulations.

These guidelines set out our requirements to comply with these obligations.

Identification requirements

We must verify the identity and address of all parties connected to a policy or account. All documents provided must be an original or a certified copy of the original document and must be clear and legible. The entire document must be provided. For documents that are not in English, a certified English translation must be provided which confirms the translation is accurate.

We reserve the right to request new copies or additional information if the documentation received does not meet our requirements. If you cannot provide the documentation required, you should contact our customer service team at mifm@monument.im.

AML Requirements for Individuals

We require one proof of identity document and one proof of address document for each person. Please note, a proof of identity document cannot be an original and must be supplied as a certified copy of the original.. The types of documents we need are:

Proof of Identity	Proof of Address
Current valid passport	Bank, building society or mortgage statement, dated within the last 6 months
Current valid driving licence (must include place of birth)	Rates, council tax, utility bill dated within the last 6 months (<i>a mobile phone bill will not be accepted</i>)
Current national identity card (must include place of birth)	Current valid driving licence (<i>showing address - but it cannot be used as “proof of address” if it has been used as “proof of identity”</i>)
	Current national identity card (<i>showing address - but it cannot be used as “proof of address” if it has been used as “proof of identity”</i>)
	Correspondence from an official independent source such as a central or local government department or another Agency dated within the last 6 months

Electronic statements or bills must be printed so that a copy can be certified by a suitable certifier.

AML Requirements for Companies

For private limited companies and public limited companies not listed on a recognised stock exchange the documents we need are:

Corporate requirements
Certificate of Incorporation or Memorandum & Articles of Association, or equivalent
Evidence of the registered office of the company
A list of all Directors, including Proof of Identity and Proof of Address for at least 2 Directors
Current Authorised Signatory List on company headed paper evidencing who can sign on behalf of the company. A copy of a board resolution relating to the signatory list must also be provided
Latest Annual Report and Accounts (where produced)
Proof of identity and address of all shareholders holding 25% or more of the issued share capital or, if no one holds 25% or more, for any majority/controlling shareholder as at the date of the application. Where a 25% holder is a holding company or trust, or nominee, proof of identity and address of its ultimate beneficial owner must also be provided

AML Requirements for Trusts

We are required to identify the Trust and all the relevant parties connected to the Trust. The documents we need are:

Trust requirements

A Certified Copy of the Trust Deed (or relevant extracts of the trust deed) and any subsequent deeds of appointment and retirement, or equivalent

For every Trustee, Settlor, Protector, Controller and any other person exercising ownership or control of the trust, the relevant identification requirements for individuals or companies must be applied

Please note verification of individual beneficiaries will also be required, should a payment be requested to be paid to a beneficiary, and provided the Trust allows this.

Requirements for approved or regulated pension schemes, including QROPS, SIPPS and RBS, can be clarified by contacting our customer service team at mifm@monument.im.

Certifying Documents

All copies of documents provided for AML purposes must be certified by a suitable certifier. For documents with multiple pages, the certifier may complete a covering letter and attach it to the copy document, providing the letter states the certification applies to the attached document.

Certifications must be on the basis that the certifier has seen the original document, be completed within the previous 6 months and the certified document must be clear and legible.

For non-photographic ID documents, the certifier must state the copy document is a 'true copy of the original'. For photographic ID documents, the certifier must have met the individual face-to-face and checked the photo represents a good likeness of the person. Therefore, for photographic ID documents, the certifier should state the copy document is a 'true copy of the original and the photograph is a good likeness of the individual'.

The following details of the certifier must be included:

- Full name
- Signature of certifier
- Regulatory number & body
- Job title
- Date of certification
- Company name & address
- Contact telephone number

We only accept certifications from:

Suitable Certifiers

A director or manager of a financial institution regulated and supervised for AML/CFT purposes on the Isle of Man, UK, Singapore or any other jurisdiction that is considered low risk by Monument International (which we can verify).

Notary public, commissioner for oaths, lawyer or advocate who is a member of a recognised professional body

An accountant who is a member of a recognised professional body

A company secretary who is a member of a recognised professional body

An officer of an embassy, consulate or high commission of the country of issue of documentary verification of identity

A member of the judiciary, registrar, a senior civil servant, a serving UK police or customs officer

A financial advisor at a financial institution regulated and supervised for AML/CFT purposes located in the Isle of Man, UK or Singapore or any other jurisdiction that is considered low risk by Monument International (which we can verify).

Certifications by teachers, doctors or the post office will not be accepted.

Please note the suitable certifier must be someone who is independent to the person whose identity is being verified. As an example, a spouse or family member cannot certify any of the documents.

Copies of documents that do not meet our certification requirements will not be accepted. If you are unsure if your certifier meets our requirements, or you have a valid reason why you are unable to provide suitably certified documents, please contact our customer service team at mifm@monument.im so we can help you and advise if an alternative approach to providing the documentation may be available.