

Monument International Fund Managers (IOM) Limited are authorised and regulated by Isle of Man Financial Services Authority and are obliged to comply with Isle of Man Anti-Money Laundering & Countering the Financing of Terrorism (AML) legislation and regulation.

These guidelines set out what we require from you whenever you request any changes to your account.

The principle behind the AML regulations.

Why do we need it?

To comply with AML regulations, we must verify the identity and address of our customers. If you are the owner of, the beneficiary of, or have any involvement in the operation of an account, we need verification of your identity and address.

When do we need it?

If you request a change to your account, for example, you wish to take money out or you wish to transfer your account to another individual then we require certain documents from you if we do not currently hold valid documents on file.

What do we need?

We require one proof of identity document and one proof of address document for each person. The types of documents we need are set out below.

Individual Requirements

Proof of Identity	Proof of Address
Current & Valid signed passport	Utility bill dated within the last 6 months (a mobile phone bill cannot be accepted).
Current & Valid Full driving licence	Current and Valid driving licence (showing address - but it cannot be used as “proof of address” if it has been used as “proof of identity”).
Current & Valid National identity card (showing name and date of birth)	Current & Valid National identity card (showing address - but it cannot be used as “proof of address” if it has been used as “proof of identity”).
	Bank, building society or mortgage statement, dated within the last 6 months
	Correspondence from an official independent source such as a central or local government department, like tax authority or another Agency showing the individual’s name and residency number (Tax Identification Number, social security/national insurance numbers) and addressed at the stated address of the individual, dated within the last 6 months

Important Note: Where an individual is genuinely not able to provide the standard proof of identity and proof of address, it is important that you contact our customer service team using mifm@monument.im who will guide you.

Monument International reserve the right to reject and request new copies if the documentation received is of substandard quality and to request further documentation if we deem it appropriate to do so.

ANTI-MONEY LAUNDERING (AML) GUIDELINES

AML Requirements for policies held by Trust

Trusts can be complex, and we are required to identify and verify not only the Trust, but the relevant parties connected to a Trust operated by either a Trust Company and/or individual Trustees.

Proof of Identity	Proof of Address
For every Trustee, settlor of the Trust, protector of the Trust, controller of the Trust and all people having a beneficial interest in the Trust we require Proof of Identity.	For every Trustee, settlor of the Trust, protector of the Trust, controller of the Trust and all people having a beneficial interest in the Trust we require Proof of Address.
Plus:	
A Certified Copy of the Trust Deed (or relevant extracts of the trust deed) and any subsequent deeds of appointment and retirement (or equivalent).	

Please note 'Individual Requirements' for the beneficiaries will also be required, should a payment be requested to be paid to a beneficiary, if the type of Trust allows this.

AML Requirements for policies held by Companies/Corporate entities

Below we set out the different types of legal structures and the ID evidence required in each case. Monument International must identify the company, the address and legal status under AML regulations.

For private limited companies (and public limited companies not listed on a recognised stock exchange) the requirements are as follows:

Proof of Identity	Proof of Address
Certified Copy of Certificate of Incorporation Memorandum (and / or Articles of Association) or equivalent document.	Evidence of the registered office of the contracting party, and if this is not the address of the application, satisfactory evidence that the applicant is using the address and the reasons for that address being used.
Plus:	
A list of all Directors, plus Proof of Identity and Proof of Address for at least 2 Directors. (Or one director and one Authorised Signatory in the case of a single director company.)	
Certified Copy of current Authorised Signatory List on company headed paper - who can sign on behalf of the company at any one time.	
A copy of a board resolution relating to the signatory list	
ID verification of all shareholders holding 25% or more of the issued share capital or, if no one holds 25% or more, AML must be obtained for any majority/controlling shareholder as at the date of the application. Where the 25% holder is a holding company or trust, or nominee, further verification of ID of its ultimate beneficial owner must also be provided.	

AML Requirements for Approved or Regulated Pension Schemes

Including QROPS (Qualifying Overseas Pension Schemes), SIPPS (Self Invested Personal Pensions Scheme) and RBS (Retirement Benefit Scheme)

Proof of Identity / Proof of Address
A Certified copy of the Trust Deed or equivalent Constitutive Documents;
Certified evidence of relevant tax authority registration or proof that the Customer is regulated, and/or authorised by the relevant authority in the relevant State e.g., print out of the relevant regulatory website of the regulated Customer evidencing their regulated status
Certified copy of the current Authorised Signatories List for the Trust

ANTI-MONEY LAUNDERING (AML) GUIDELINES

Can I submit documentation in electronic form?

AML regulations, in certain instances, will allow us to accept electronic copies of identity documents. These documents should be provided as an image file or PDF.

For Proof of Identity documentation (such as a passport or driving licence) a photograph should be provided which clearly shows the person's face and the image on the identity document being held in the same picture to demonstrate this belongs to the customer. A clear scanned copy of the document itself should also be provided.

For Proof of Address documents, as outlined under Individual Requirements, a statement or bill in an e-format which must clearly show the address of the property (not just the customer's email address) and must be no more than 6 months old can be provided.

Important note: We will not always be able to accept Electronic Documents. If this is the case, we will request that original or suitably certified documents are forwarded.

What is a Certified Document?

The data contained in these documents must be clear, current & certified in line with our guidelines. The entire document must be provided. Monument International reserves the right to reject and request new copies if the documentation received does not meet our requirements outlined in this document.

When a document is certified it must include a statement such as "This document is a true and accurate copy of the original seen before me on DD/MM/YYYY" and, if identifying a natural person, certify that it is "a true likeness of the individual".

The certifier's name must be clearly shown in block capitals along with their signature.

The certification must be done within the last 6 months.

Who Can Certify Documents?

We can accept certifications from the following individuals:

- a solicitor, lawyer, advocate, or notary public who is a member of a recognised professional body
- an accountant who is a member of a recognised professional body
- a Financial Adviser who is a member of a recognised professional body
- a commissioner for oaths who is authorised to issue or certify copy documents

Important note: The certifier must state their contact details including - Address / Contact Telephone Number / Email / Occupation / Date of Certification / Regulatory Number & Body.

Monument International reserve the right to reject and request new copies if the documentation received is of substandard quality and to request further documentation if we deem it appropriate to do so.

Other common forms that may need to be submitted along with AML requirements include:

- Tax Residency Self-Certification
- Source of Funds

Should these be required, Monument International will request them separately.