

Annexes – Client Onboarding Document Lists – Structure and Guidance Notes

The annexes below are structured as follows:

- Annex 1: Onboarding Evidence List - Eligible data points, recommended evidence, substitutions, and minimum parameters
 - Annex 1a: Identity (of the onboarded entity) – whether the legal entity exists and is who it claims to be;
 - Annex 1b: Business (of the onboarded entity) – what the entity does, how it does it, and whether it complies with necessary rules to do it;
 - Annex 1c: Structure – the natural and legal persons related to the legal entity which need to be due diligenced and how to prove their connection;
 - Annex 1d: Connected Parties – the information that needs to be evidenced about the parties identified in Annex 1c; and
 - Annex 1e: Supplementary Operational Data – other key data commonly gathered at the point of onboarding, but outside of KYC/AML requirements.
- Annex 2: Mapping of Suggested Documents to Data Points
- Annex 3: Principles for Gathering of Data Points and Evidence
 - Annex 3a: Sourcing
 - Annex 3b: Hierarchy of Sources
 - Annex 3c: Evidence Type
- Annex 4: Recommended Process for Sourcing of Evidence
- Annex 5: Sample Communication to Clients

Annex 1 Onboarding Evidence List - Introduction

Example:

Ref	Data Point	Client Type	Golden Source	Examples of Public Evidence	Recommended Non - Public Evidence	Alternative Non-Public Evidence	Additional Requirements	Timeliness	Notes
A3a	COUNTRY OF INCORPORATION	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Listing documents for equity or debt instruments 	N/A – public information highly recommended	Formation documents			
D3	CERTAIN CONNECTED PARTIES - NATIONALITY	All	<ul style="list-style-type: none"> Government Rarely public 	N/A	Passport or other ID issued by the national or federal government		Certified within 12mo or seen by Level 2c employee	In validity period in first instance	Only one passport or ID required where multiple nationalities held, but client/connected party should list all nationalities

Column headings in Annex 1 have the following meanings:

- Ref: for mapping purposes [to be reordered prior to finalisation of the Standard]
- (Connected Party: in the case of Annex 1d, the connected person(s) to whom the Data Point pertains)
- Data Point: the data point required
- Client Type: the type of client for which this Data Point is required
- Examples of Public Evidence: a non-exhaustive list of potential sources and documents that are sufficiently credible and in the public domain
- Golden Source: the creator of the Data Point or deemed definitive source, and how often the Data Point is publicly available from this source (usually/sometimes/rarely/bespoke to the trading relationship)
- Recommended Non-Public Evidence: The most authoritative, widely available documentation which clients could produce to evidence required Data Points, if unavailable from public sources, and which should be accepted by firms
- Alternative Non-Public Evidence: The next most authoritative, widely available documentation, which should be accepted by firms if the Recommended Non-Public Evidence cannot be provided by the client
 - May be blank if no consensus exists on the next best
- Timeliness: what is the maximum time period which may have elapsed since the document was created/dated (or other action if indicated)? Where Evidence is usually public, issued only once, or bespoke to the client relationship, this may be blank
- Additional Requirements: any additional parameters that the client-submitted evidence must meet e.g. auditing, notarisation, etc.
- Notes: Comments

Notes:

- Recommended Non-Public Evidence and Alternative Non-Public Evidence are only required from the client where there is insufficient authoritative evidence in the public domain.
- If Golden Source or other sufficiently authoritative evidence is usually public, the non-availability of such evidence may require explanation from the client and/or further due diligence. Therefore, Recommended Non-Public Evidence may be unpopulated. If a consensus exists on other acceptable evidence, provided such explanation is acceptable, this will be listed under Alternative Non-Public Evidence.
- Certain documents may be public or private, depending on the regulatory or other obligations of the client and/or client choice. Where a document type appears in both Examples of Public Evidence and the Recommended or Alternative Non-Public Evidence columns, onboarding firms should seek to obtain the document publicly before requesting from clients.
- Data Points and Evidence, where capitalised, refer to the items in Annex 1. Otherwise, they take their generic meaning and/or refer to required or acceptable data points or evidence as determined by the Onboarding Firm.

Annex 1a Onboarding Evidence List – Identity

Ref	Data Point	Client Type	Golden Source	Examples of Public Evidence	Recommended Non-Public Evidence	Alternative Non-Public Evidence	Additional Requirements	Timeliness	Notes
A1a	LEGAL NAME	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Listing documents for equity or debt instruments 	N/A – Public documents highly recommended	Formation documents Change of Name documents (if relevant)			
A1b	PREVIOUS NAMES	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Change of Name documents Listing documents for equity or debt instruments 	N/A – Public documents highly recommended	Change of Name documents			Limited to changes in the last 5 years.
A1c	LEGAL FORM	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Listing documents for equity or debt instruments 	N/A – Public documents highly recommended				Consider using GLEIF Entity Legal Form ISO Standard.
A2	LEGAL REGISTERED ADDRESS	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Listing documents for equity or debt instruments 	N/A – Public documents highly recommended	Formation documents			
A3a	COUNTRY OF INCORPORATION	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Listing documents for equity or debt instruments 	N/A – Public documents highly recommended	Formation documents			
A3b	COUNTRY OF REGISTRATION (IF DIFFERENT)	ALL	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Listing documents for equity or debt instruments 	N/A – Public documents highly recommended	Formation documents			Relevant to e.g. foreign branches.
A4	DATE OF ESTABLISHMENT	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports Listing documents for equity or debt instruments 	N/A – Public documents highly recommended	Formation documents			
A5	REGISTRATION NUMBER	All	<ul style="list-style-type: none"> Government Usually public 	<ul style="list-style-type: none"> Companies Registry Annual Reports 	N/A – Public documents highly recommended	Formation documents			

				<ul style="list-style-type: none"> Listing documents for equity or debt instruments 					
A6	TAX NUMBER	All	<ul style="list-style-type: none"> Government Sometimes public 	<ul style="list-style-type: none"> Tax registry (where existing) 	Extract from tax return to national/federal tax authority	Letter from national/federal tax authority		Latest that remains valid	
A7	TAX RESIDENCE	All	<ul style="list-style-type: none"> Government Sometimes public 	<ul style="list-style-type: none"> Tax registry (where existing) Client websites 	CRS form completed by the client	N/A – Client declaration		Latest that remains valid	

Annex 1b Onboarding Evidence List – Business

Note that for this section in particular, many data points cannot be evidenced to a higher standard than a client declaration. Firms are encouraged to leverage information obtained by the client’s relationship manager(s) in the ordinary course of business to both populate and corroborate the data points.

Ref	Data Point	Client Type	Golden Source	Examples of Public Evidence	Recommended Non-Public Evidence	Alternative Non-Public Evidence	Additional Requirements	Timeliness	Notes
B1	INDUSTRY TYPE	All	<ul style="list-style-type: none"> Government (upon client declaration) Usually public 	Companies Registry Annual Reports	N/A	Client declaration			e.g. NAICs Onboarding firms may elect to change the client’s classification from what was declared for internal risk management.
B2	NATURE OF BUSINESS	All	<ul style="list-style-type: none"> Client Usually public 	Companies Registry Annual Reports Client website	N/A	Client declaration			Client clarification/disclosure on business (c.f. #9 Industry Type) Firms may differ in questions asked to client on this point.
B3	PRINCIPAL PLACE OF BUSINESS	All	<ul style="list-style-type: none"> Client Usually public 	Companies Registry Annual Reports Client website	N/A	Client declaration			
B4a	REGULATORY STATUS	All	<ul style="list-style-type: none"> (Quasi-) government Usually public 	Regulator’s Website	N/A – Public documents highly recommended				In limited circumstances where a public register does not exist, it is recommended that clients are asked to provide the latest return to or letter from the regulator, but onboarding firms maintain the discretion to request additional information.
B4b	NAME OF REGULATOR IF APPLICABLE	All	<ul style="list-style-type: none"> (Quasi-) government Usually public 	Regulator’s Website	N/A – Public documents highly recommended				As above.
B4c	TENURE OF REGULATION	All	<ul style="list-style-type: none"> (Quasi-) government Usually public 	Regulator’s Website	N/A	Client declaration			How long the client has been regulated.
B5a	LISTING STATUS	All	<ul style="list-style-type: none"> Third party – exchange Usually public 	Exchange website	N/A – Public documents highly recommended				Where a client has chosen to be listed on an exchange – excludes OTC markets. Specify where “pending”.
B5b	NAME OF EXCHANGE	Public	<ul style="list-style-type: none"> Third party – exchange Usually public 	Exchange website	N/A – Public documents highly recommended				Where a client has chosen to be listed on an exchange – excludes OTC markets. Specify where “pending”.
B6	SANCTIONS COMPLIANCE	All	<ul style="list-style-type: none"> Client Bespoke 	N/A	One or more of: Client declaration (Wolfsberg Questionnaire) Other proprietary form AML Letter	N/A – Client declaration			The exact requirements will be conditional on the attributes of the client and should be selected and communicated by the onboarding firm. Adverse news may provide indications, but its absence may not be definitive.
B7	PRIMARY PURPOSE OF THE RELATIONSHIP	All	<ul style="list-style-type: none"> Client Bespoke 	N/A	Client declaration Trade documentation from the Relationship Manager	N/A – Client declaration			
B8	INITIAL FUNDING AMOUNT	All	<ul style="list-style-type: none"> Client Bespoke 	N/A	Client declaration	N/A – Client declaration			

					Trade documentation from the Relationship Manager				
B9	TYPE OF FUNDS	All	<ul style="list-style-type: none"> Client Bespoke 	N/A	Client declaration Trade documentation from the Relationship Manager	N/A – Client declaration			Currency/product mix for the account.
B10	SOURCE OF FUNDS	All	<ul style="list-style-type: none"> Client Bespoke Sometimes publicly disclosed 	Annual report Listing documents for equity or debt instruments or prospectus for other corporate actions	Annual Report or other audited financial statements Client declaration	Client declaration		Most recent (if annual report/financials)	Source of the tranche into the account Sometimes disclosed e.g. use of proceeds from issuance or corporate actions.
B11	SOURCE OF WEALTH	All	<ul style="list-style-type: none"> Client Sometimes publicly disclosed 	Annual Report or other audited financial statements	Annual Report or other audited financial statements	Client declaration		Most recent (if annual report/financials)	
B12	ANTICIPATED TRANSACTION ACTIVITY	All	<ul style="list-style-type: none"> Client Bespoke 	N/A	Client declaration	N/A – Client declaration			May be obtained through agents of the onboarding firm, e.g. relationship managers.
B13	REDEMPTION CYCLE	Funds (Hedge /PE Funds only)	<ul style="list-style-type: none"> Client Sometimes publicly disclosed 	Prospectus /LP agreement	Prospectus /LP agreement	Client declaration		Most recent prospectus or original if no updates	
B15	EVIDENCE OF AML PROGRAMME	Financial Institutions	<ul style="list-style-type: none"> Client Rarely public / bespoke 	N/A	One or more of: Wolfsberg questionnaire ISSA questionnaire AML letter	N/A – Client declaration			The exact requirements will be conditional on the attributes of the client and should be selected and communicated by the onboarding firm.
B16	REGISTERED SHARE STATUS	All	<ul style="list-style-type: none"> Government (upon client declaration) Sometimes public 	Companies registry Annual Report	Articles of Association Annual Report	Client declaration: Bearer share declaration form			Limited to bearer share jurisdictions.
B17	NAME OF REGULATOR IN HOME COUNTRY	Financial Institutions	<ul style="list-style-type: none"> (Quasi-) government Usually public 	Regulator’s website	N/A				
B18	LICENSE TO OPERATE IF REQUIRED	Financial Institutions	<ul style="list-style-type: none"> (Quasi-) government Rarely public 	N/A	N/A	Copy of License		Latest iteration, original if no changes	May not be applicable e.g. where regulator does not issue physical licenses.
B19	TRADING NAME	All	<ul style="list-style-type: none"> Client Usually public 	Trade register Annual report	Annual report				

Annex 1c Onboarding Evidence List – Structure

This list highlights the legal and natural persons who **must be identified** for each type of client being onboarded, alongside ways of **evidencing their relationship** to the onboarded entity. They represent those which may exert significant influence over the strategic direction of the onboarded entity and/or legally bind the entity, either through their position (natural persons only), or ownership.

Disclosure of over 10% shareholdings is usually disclosable by the shareholder due to transparency laws; however, it is not always practical for onboarding firms to piece together an entire company hierarchy. Firms are expected to use public sources to corroborate the client disclosure. Therefore, clients may initially be requested for a structure chart for the ownership component. Any structure chart or company hierarchy should identify any direct shareholders, controlling parties (legal persons) and UBOs (natural persons) above the threshold AND the full chain of ownership for each. Any regulated and/or listed entities on the chart should be highlighted.

For Clients subject to standard Customer Due Diligence or Simplified Due Diligence, the ownership threshold for legal or natural persons is 25% of either voting or economic rights, or both. Clients which are assessed as requiring Enhanced Due Diligence may require information about persons with a lower aggregate ownership.

Section 1c)i: Natural Persons with control through appointment or election

Ref	Data Point	Client Type	Golden Source	Examples of Public Evidence	Recommended Non-Public Evidence	Alternative Non-Public Evidence	Additional Requirements	Timeliness	Notes
C1	KEY CONTROLLERS	All	<ul style="list-style-type: none"> Client Sometimes public 	Annual Report (if contained within) Client website	Any and all relevant of: Register of directors Board Resolution Certificate of incumbency Letter of authority Power of attorney		Client may be asked to provide written confirmation that documents submitted represent the current state or list changes	Most up to date	Individuals with significant influence to control, manage, or direct the Client. Will usually include Board of Directors, Executive Board / Managing Members / Partners as per the Client's legal form.
C2	CERTAIN AUTHORISED SIGNATORIES	All	<ul style="list-style-type: none"> Client Sometimes public 	Client Website (if contained)	Any and all relevant of: Authorised Signatories List Power of Attorney Corporate Resolution Letter of Authorisation (Customer) Board Resolution Signature mandate		Client may be asked to provide written confirmation that documents submitted represent the current state or list changes	Most up to date	A subset of signatories that may bind the onboarded entity for the transaction activity anticipated with the Client.
C3	ACCOUNT OPENING AGENT	All	<ul style="list-style-type: none"> Client Bespoke 	N/A	Any and all relevant of: Board Resolution Secretary's certificate Register of members Account Openings Form or other contract			Dated within 12mo	

Section 1c)ii: Legal Persons with control through ownership

Trust structures are considered as if they were a single legal person. Where a trust owns more than the threshold of the Client, they fall under this category even if no natural person who is a beneficiary of the trust owns more than the threshold individually.

Ref	Data Point	Client Type	Golden Source	Examples of Public Evidence	Recommended Non-Public Evidence	Alternative Non-Public Evidence	Additional Requirements	Timeliness	Notes
C4	DIRECT SHAREHOLDERS WITH CONTROLLING STAKE	Private	<ul style="list-style-type: none"> Client Sometimes public 	Audited financials / annual report (if contained within) RNS reports	Share register AML letter with % investor confirmation Confirmation from a trusted third party certifier via email		<p>Verified by third party</p> <p>Client may be asked to provide written confirmation that documents submitted represent the current state or list changes</p>	Most up to date	<p>If no direct shareholders have more than the threshold stake, a client declaration may be sufficient.</p> <p>While shareholdings may have changed since the date of the evidence independently gathered or submitted by the client, disclosure rules around shareholdings should allow onboarding firms to confirm the changes through publicly available information.</p>
C5	INDIRECT / INTERMEDIATE SHAREHOLDERS WITH CONTROLLING STAKE	All	<ul style="list-style-type: none"> Client Sometimes public 	Audited financials / annual report (if contained within) RNS reports	Annual Report (if included) AML letter with % investor confirmation Confirmation from a trusted third party certifier via email		<p>Verified by third party</p> <p>Client may be asked to provide written confirmation that documents submitted represent the current state or list changes</p>	Most up to date	<p>If no direct shareholders have more than the threshold stake, a client declaration may be sufficient.</p> <p>While shareholdings may have changed since the date of the evidence independently gathered or submitted by the client, disclosure rules around shareholdings should allow onboarding firms to confirm the changes through publicly available information.</p>

Section 1c)iii: Natural Persons with control through ownership

Ref	Data Point	Client Type	Golden Source	Examples of Public Evidence	Recommended Non-Public Evidence	Alternative Non-Public Evidence	Additional Requirements	Timeliness	Notes
C6	UBOs	All	<ul style="list-style-type: none"> Client Sometimes public 	Audited financials / annual report (if contained within) RNS reports	Share register UBO form		<p>Verified by third party</p> <p>Client may be asked to provide written confirmation that documents submitted represent the current state or list changes</p>	Most up to date	<p>If no direct shareholders have more than the threshold stake, a client declaration may be sufficient.</p> <p>Particularly when a trust structure is an intermediate controlling party, beneficiaries which are deemed Connected may be designated as UBOs if the total ownership of the Connected parties is over the threshold, even if the individual persons' ownership is below the threshold.</p>
C7	SENIOR MANAGING OFFICIAL / NBOs	Conditional – see Notes							<p>Where no UBO exists with more than the threshold ownership, the Senior Managing Official / NBO will be chosen by onboarding firm in lieu, as a person with significant control.</p> <p>The SMO / NBO will be selected from the list of Key Controllers and Senior Executives, therefore, no additional sources or evidence are required.</p>

Annex 1d Onboarding Evidence List – Connected Parties

The first table highlights the Data Points which may be required **about** certain legal and natural persons identified in Annex 1c. The second table shows the evidence for those Data Points for natural persons. For legal persons, please refer to the corresponding item in Annex 1a.

Data Point →	Legal Name	Country of Incorporation	Legal Registered Address	Name of Regulator (if any)	Name of Exchange (if any)	Name	Job Title	Nationality (All)	Date of Birth	Home Addresses
Connected Party ↓	A1a	A3a	A2	B4b	B5b	D1	D2	D3	D4	D5
KEY CONTROLLERS						X	X	X	X	X
AUTHORISED SIGNATORIES*						X		X	X	
ACCOUNT OPENING AGENT						X		X	X	
DIRECT SHAREHOLDERS WITH CONTROLLING STAKE (OVER 25%)**	X	X	X	X	X					
INDIRECT / INTERMEDIATE SHAREHOLDERS WITH CONTROLLING STAKE (OVER 25%)**	X	X	X	X	X					
UBOs						X		X	X	X

* Required only for a subset of individuals

** Legal persons – please see UBOs for natural persons. Where a Trust structure exists, they are treated as if they were a legal person, however no Module yet exists for Trusts and therefore Annex 1a may not apply. Firms may follow their own internal policies to populate and verify the data points required.

Ref	Data Point	Client Type	Golden Source	Examples of Public Evidence	Recommended Non-Public Evidence	Alternative Non-Public Evidence	Additional Requirements	Timeliness	Notes
D1	NAME	All	<ul style="list-style-type: none"> Government Rarely public 	N/A	Passport or other ID issued by the national or federal government		Certified within 12mo or seen by Level 2c employee*	In validity period in first instance	
D2	JOB TITLE	All	<ul style="list-style-type: none"> Client Sometimes public 	Annual reports	Client Declaration				
D3	NATIONALITY	All	<ul style="list-style-type: none"> Government Rarely public 	N/A	Passport or other ID issued by the national or federal government		Certified within 12mo or seen by Level 2c employee*	In validity period in first instance	Only one passport or ID required where multiple nationalities held, but client/connected party should list all nationalities.
D4	DOB	All	<ul style="list-style-type: none"> Government Rarely public 	N/A	Passport or other ID issued by the national or federal government		Certified within 12mo or seen by Level 2c employee*	In validity period in first instance	
D5	PRIMARY RESIDENTIAL ADDRESS	All	<ul style="list-style-type: none"> Client Not usually public 		Utility Bill (physical supply i.e. not mobile phone) Council (tax) Bank/credit card statement Drivers' license			For Drivers' license: in validity period All others: dated within 3mo	

* See Annex 3b

Annex 1e Onboarding Evidence List – Supplementary Operational Data [IN PROGRESS – NON-BINDING]

This list highlights key operational data that should be considered for collection at the point of onboarding.

Ref	Entity/Person	Data Point	Client Type	Notes
		LEI		
		SSIs		
		Telephone Number		
		Trading Name		
		Email Address		
		Client Capacity (e.g., Principal/ Agent)		
		Executor/ Primary Order Placer		
		Purpose of Relationship		
		Know Your Business (KYB) – products to be traded, size, and frequency		

Annex 3a Principles for Gathering of Data Points and Evidence: Sourcing

- The level of proof for a data point can only be as high as the least credible source in the chain of evidence from data point creator to the onboarding firm, unless a more credible downstream intermediary conducts adequate due diligence.
- Notwithstanding the benefits of external due diligence, documents/evidence should be sourced as close as possible to the creator of a data point to minimise errors in the faithfulness of reproduction.
- Where a document/evidence's credibility has been enhanced because of representations made to another body, efforts should be made to source the document independently from the sender.
- For jurisdictions deemed appropriately regulated, as determined by the onboarding firm, the deemed trustworthiness of a source, for the purposes of onboarding, should follow the hierarchy in Annex 3b. Firms should consider the relative trustworthiness of sources when considering others or comparing across jurisdictions.

Annex 3b Principles for Gathering of Data Points and Evidence: Hierarchy of Sources

Below is applicable for countries deemed appropriately regulated by the onboarding firm. It may not be applicable in other jurisdictions and/or situations which are deemed to require Enhanced Due Diligence, e.g. the presence of higher risk PEPs. When multiple jurisdictions are concerned, firms should consider the relative trustworthiness of sources across these jurisdictions.

In accordance with the “weakest link” principle, the below hierarchy applies where the sources listed are the “golden source” / creator of a particular data point, OR the sources listed have performed sufficient due diligence on evidence for a data point to be equal to confirming their veracity, for example, in the context of an audit. Evidence that is merely “passed through” without additional verification, for example, an unaudited client submission being hosted on an exchange website or data aggregator, cannot be elevated above its previous source level. In this example, the act of submission to an exchange and/or its publication may, however, elevate the credibility of the document within Level 3, in accordance with the principles in Annex 3c.

Notwithstanding the credibility of the source, where clients rely upon bespoke declarations in lieu of commonly available documentation, onboarding firms should critically assess the reasons for the absence of these documents.

Level 1: Government and quasi-government agencies

- Obtained from a municipal, nation, supranational or international government source, or organisations affiliated to, delegated to, or endorsed by the above, such as:
 - A registry;
 - A regulator;
 - A tax authority.
- Aggregators, where firms deem the auditability and/or immutability of evidence for a data point is as if received directly from the data creator.

Level 2a: Trusted Market Infrastructure Providers and other public sources

- Obtained from exchanges
- Obtained from audit firms, legal services firms, and other regulated legal, professional or business service industries
- Aggregators, where firms deem the provider adequately trustworthy, but where the auditability and/or immutability of evidence does not satisfy Level 1.

Level 2b: Certified by regulated individuals

- Practitioners of legal, professional or business service industries who are personally regulated;
- Certified documents obtained directly from the client where the name and (where applicable) register number of the certifier is legible.

Level 2c: Employees of the Onboarding Entity

- Observed directly by employee of the firm onboarding the client
 - Firms should consider the seniority, position, frequency of contact with the client, and any legal entity considerations between the employing entity and entit(ies) which the onboarding covers when determining whether a representation from the employee is sufficient to satisfy any particular data point.

Level 3: No external verification

- Document obtained from the client with no additional external verification.

Annex 3c Principles for Gathering of Data Points and Evidence: Evidence Type

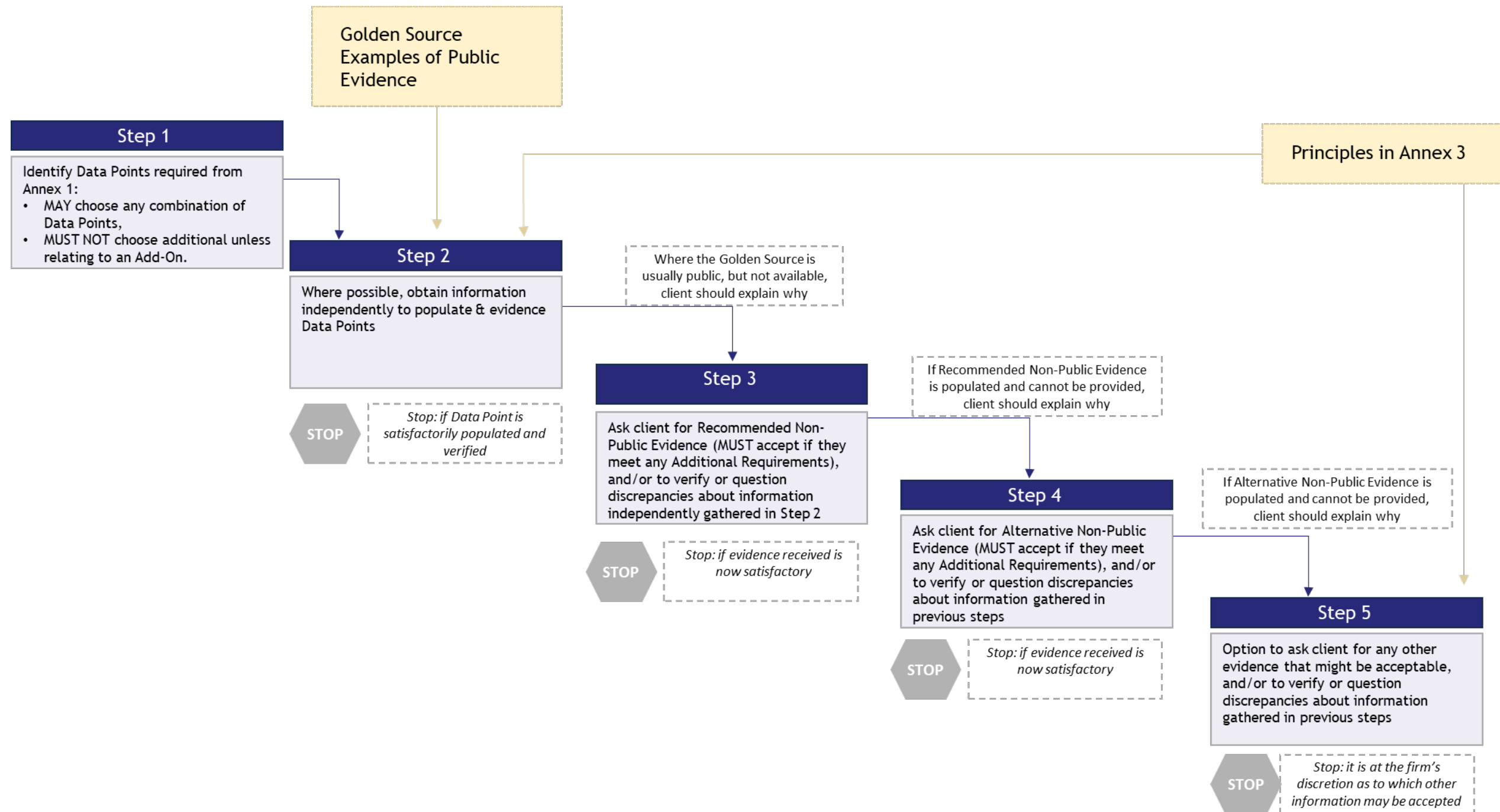
- Within the same source, there is a hierarchy of document/evidence types. Documents/evidence will be more credible depending on the strength and accuracy of one or more of the following non-exhaustive criteria:
 - They are legislative or regulatory requirements;
 - They carry significant consequences in case of inaccuracies;
 - They have been authorised at a higher levels of governance;
 - They are of more widespread application;
 - They have been submitted to other parties; and/or
 - They have been made public.

Example:

	Constitutional and Governance Documents	Rationale
Highest	Formation documents (where filed with gov. authority)	Signed at the highest level of governance Most authoritative – give effect to all other rights and liabilities of the entity and prevail in case of inconsistencies Regulatory requirement Submitted to government authority Public
	Annual required filings (where filed with gov. authority)	Signed at the highest level of governance Significant consequences if material inaccuracies Regulatory requirement Submitted to government authority Public
	Board resolutions	Signed at the highest level of governance Most authoritative – subservient only to formation documents
	Internal policies and procedures (global vs desk-level)	Global policies will be of <i>more widespread application</i> Global policies are likely to have been <i>authorised at higher levels of governance</i> Note: certain low-level policies may be less authoritative than certain emails
Lowest	Emails (seniority, audience)	Generally, emails are to select parties and non-public and therefore less authoritative An email’s credibility may be strengthened if sent by senior executives, to government or other agencies, are in response to legislative or regulatory requirements.

Annex 4 Recommended Process for Sourcing of Evidence

Not applicable to Add-Ons under Core Principle 6.



Step 1: identify Data Points required from Annex 1 (MAY choose any combination of Data Points, MUST NOT choose additional unless relating to an Add-On)

Step 2: try to obtain information independently to populate & evidence those DATA Points to onboarding firm's satisfaction, considering the Golden Source and Examples of Public Evidence, if any, and the principles in Annex 3.

If Data Point is satisfactorily populated and verified, STOP.

ELSE, where the Golden Source is usually public but not available, client should explain why. Continue

Step 3: firm should ask client for Recommended Non-Public Evidence if populated (MUST accept if they meet any Additional Requirements), and/or to verify or question discrepancies about information independently gathered in Step 2.

If Data Point is satisfactorily populated and verified, STOP.

ELSE, if Recommended Non-Public Evidence is populated and cannot be provided, client should explain why. Continue

Step 4: firm should ask client for Alternative Non-Public Evidence in Annex 1 if populated (MUST accept if they meet any Additional Requirements), and/or to verify or question discrepancies about information gathered in previous steps.

If Data Point is satisfactorily populated and verified, STOP.

ELSE, if Alternative Non-Public Evidence is populated and cannot be provided, client should explain why. Continue

Step 5: firm may ask client for any other evidence that might be acceptable, and/or to verify or question discrepancies about information gathered in previous steps. It is at the onboarding firm's discretion as to other information that MAY be asked for and accepted, considering the principles in Annex 3.

Note: it is not expected that these steps happen simultaneously for all Data Points selected. For example, evidence about connected parties in Annex 1d will require the connected parties to be identified first. Firms should, however, be conscious of Core Principle 8 and combine requests for evidence where reasonably possible.

Annex 5 Sample Communication to Clients

We conduct our client onboarding processes in accordance with the Core Principles in the Financial Markets Standard Board publication [Standard for Client Onboarding: Documentation and Processes] (the “FMSB Standard”).

While we will endeavour to independently obtain the information we require about you and any connected parties, where such information is bespoke to any future relationship, or adequately reliable evidence is not in the public domain, we may require additional documentation from you. We will communicate the required documentation, including any additional attributes, as clearly and as efficiently as possible.

Where the requirement to gather documentation stems from the application of UK legislation, regulation and/or guidance for KYC, our requirements are guided by Annex 1 of the FMSB Standard. If you are unable to provide the requested documentation, we may require you to explain the reasons, and acceptance of alternative evidence will be at our discretion.

[If applicable: As this is a refresh based upon an existing relationship with you, we anticipate that the evidence required from you will be more limited than if this were a new client relationship, in particular in relation to data points which are static in nature (for example, date of birth for natural persons).]

[If applicable: As you are a newly incorporated entity or an entity yet to be incorporated, while the evidence set we may require from you will remain guided by Annex 1 of the FMSB Standard, we may require one or more of these documents to be certified by an independent third party, the requirements of which will be communicated to you.]

The FMSB Standard recognises that risks relating to compliance with sanctions regulations are significant, and depending on the size, complexity, and location of where you do business, we may have additional requests for information or evidence from you. Additionally, we may have other onboarding requirements outside of Annex 1 of the FMSB Standard, including but not limited to the industry in which you operate, the laws of other jurisdictions by which we are bound, your anticipated transactions with us, or requirements for enhanced due diligence.