AML/KYC

Guide for Individuals

Overview

We operate robust AML/KYC policies in line with global regulatory standards, including European regulatory standards, and on a risk-based approach for client onboarding.

We have put together this guide to help you obtain the required AML/KYC documents from your client, dependent on their risk category. The different risk factors are detailed in the guide.

We consider all professional investors to be high risk.

No monies should be sent to us until we have completed our checks on the client and accepted them, as we will be unable to apply funds prior to this. We reserve the right to return funds if necessary.

Please note that these lists are not exhaustive. We can consider other suitable documents for how funds have been acquired or to evidence where funds are being held. We reserve the right to request information in addition to what is detailed in this document at our discretion.

Applicable to all risk categories

Identity Documents

Listed below are the typical and acceptable documents for verifying a client's identity and address. Please note that one document cannot be used as evidence for both ID and address. All documents provided must be clear and legible and preferably in colour.

Account Type	Acceptable Evidence of Identification	Acceptable Evidence of Address
Individual or jointly held accounts. (For joint accounts, evidence is required for each joint holder)	◇ A current (not within 6 months of expiry) photograph bearing passport. ◇ National Identity Card ◇ Residency Card (such as EEA Member State Card & TIE Card)	◇ A utility, gas, electric, water or telephone landline, rates or council bill dated within 4 months ◇ A bank or bank credit card statement dated within 4 months ◇ Proof of home ownership or a rental agreement or a mortgage statement dated within 4 months ◇ A current (issued within 4 months) photograph bearing driving license ◇ Municipality letter issued within 4 months ◇ Government or tax authority letter issued within 4 months

Please note that we do not accept PO box addresses.

All documents must be certified by an authorised certifier as follows:

- ◇ Certification of Identity: "True copy of the original and a true likeness of the person" or equivalent.
- ◇ Certification of Address: "True copy of the original" or equivalent.
- ◇ All certification must be signed, dated and have the firms stamp on them, with the name and the capacity of the person certifying the document.

If the authorised signatory is a professional person or someone of standing in the community then they must be listed on/in a public register or the certificate must be accompanied by evidence of their standing in the community.

Source of Wealth

We require source of wealth information for all new business submitted to Novia Global. This should show how the applicant's funds have been accrued. Please collect and provide the following information dependent on the type of source relevant to your client.

We will not accept loans as a source of wealth.

Origin of Funds	Information Provided at Online Application Stage	Additional Evidence of Source of Wealth For High Risk Clients
Savings from Income	◇ Employer's name and location ◇ Occupation ◇ Income p.a. and/or bonus amount	◇ A bank statement clearly showing receipt of salary payments or a copy of an employment contract to evidence savings from income. ◇ A tax declaration form
Property Sale	◇ Details/address of property ◇ Date of sale ◇ Total sale amount ◇ Sale contract to evidence property sale.	◇ A signed letter from a solicitor/estate agent.
Company Sale	◇ Name and nature of company ◇ Date of sale ◇ Total amount ◇ Applicant's share ◇ Purchaser	◇ A signed letter from a solicitor/regulated accountant or copy of the contract of sale to evidence company sale. ◇ The sale agreement and a bank statement illustrating the incoming of the funds of the specific sale.
Inheritance	◇ Details of Inheritance (including benefactor) ◇ Date received ◇ Total amount	◇ A copy of the will with a grant of probate or a signed solicitors' letter to evidence inheritance.
Gift	◇ Date received ◇ Total amount ◇ Reason for gift ◇ Relationship of donor to applicant ◇ Confirmation of the donor's origin of funds details.	◇ A letter from the donor confirming gift details, copy of the donor's ID and suitable evidence of the donor's origin of funds to evidence a gift.
Compensation Payment	◇ Date received ◇ Total amount ◇ Reason for payment, including who from	◇ A Letter/court order from compensating body or solicitors letter to evidence a compensation payment.
3rd Party Pension	◇ Name of the 3rd party provider ◇ Occupation details for the underlying client	◇ A valuation to demonstrate how the funds were accrued.
Retirement income	◇ Retirement date ◇ Details of previous occupation ◇ Name and address of previous employer ◇ Approx. salary on retirement	◇ A pension statement, bank statements, savings account statements or a letter from an accountant to evidence retirement income

Source of wealth for Pensions

For the SIPP product, we act solely as an introducer. You should always refer to the most recent requirements and guidance issued by Novia Global Limited. Based on the latest review, the following documentation is required:

	Information Provided at Online Application Stage	Additional Evidence That May Be Required
UK Pension transfers	◇ Name of the transferring scheme and amount (These are included in the transfer documents which will suffice)	◇ For clients with a very high-risk occupation, or transfers over £500,000 or currency equivalent, we require a short employment history to demonstrate how the funds were accrued.
Overseas Pension Transfers	◇ Name of the transferring scheme and amount (These are included in the transfer documents which will suffice) ◇ A short employment history to demonstrate how the funds were accrued.	

Very high-risk occupations/industries for Pensions

- ◇ Politically Exposed Persons
- ◇ Defence/Military

Source of Funds

We may ask for confirmation or evidence of source of funds, as it is important that we understand where funds are held before they get to us. For example, if the money is being held in a bank account, with another provider or an insurer.

Evidence of source of funds may include:

- ◇ A bank statement, to show the bank account the funds are being held in.
- ◇ A valuation, to show the funds are being held with another provider.

As part of our AML policy, we do not accept third party payments for GIAs.

High risk category by Country

If your client is born, resident in or a national of any of the following countries below will be considered high risk.

Africa

Algeria	Cote D'Ivoire	Lesotho	Rwanda
Angola	Djibouti	Liberia	Sao Tome & Prin.
Benin	Egypt	Madagascar	Senegal
Botswana	Equatorial Guinea	Malawi	Seychelles
Burkina Faso	Eswatini	Mali	Sierra Leone
Burundi	Ethiopia	Mauritania	South Africa
Cameroon	Gabon	Mauritius	Tanzania
Central African Republic	Gambia	Morocco	Togo
Chad	Ghana	Mozambique	Tunisia
Comoros	Guinea	Namibia	Uganda
Congo (Brazzaville)	Guinea-Bissau	Niger	Zambia
Congo (DRC)	Kenya	Nigeria	

Asia

Armenia	Jordan	Nepal	Timor-Leste
Bahrain	Kazakhstan	Oman	Turkey
Bangladesh	Kuwait	Pakistan	Turkmenistan
Bhutan	Kyrgyzstan	Philippines	United Arab Emirates
Cambodia	Laos	Qatar	Uzbekistan
China	Macau	Saudi Arabia	Vietnam
Hong Kong	Malaysia	Sri Lanka	
India	Maldives	Tajikistan	
Indonesia	Mongolia	Thailand	

Europe

Azerbaijan	Georgia	Monaco	Turkey
Albania	Gibraltar	Montenegro	Ukraine
Bosnia-Herzegovina	Isle Of Man	North Macedonia	
Bulgaria	Kosovo	San Marino	
Croatia	Moldova	Serbia	

North America

Antigua & Barbuda	Cayman Islands	Haiti	St Kitts & Nevis
Aruba	Costa Rica	Honduras	Trinidad & Tobago
Bahamas	Dominican Republic	Jamaica	UK Virgin Islands
Barbados	El Salvador	Mexico	
Belize	Guatemala	Panama	

Australia/Oceania

Fiji	Papua New Guinea	Solomon Islands	Vanuatu
Palau	Samoa		

South America

Bolivia	Ecuador	Peru	Venezuela
Brazil	Guyana	Suriname	
Colombia	Paraguay	Uruguay	

The list of High-Risk jurisdictions is correct at the time of publication and may change from time to time.

Rejected countries

Clients resident in these countries will not be accepted onto the platform. If a client is national of or was born in of any of these countries, we can consider the application with additional information and evidence. Please discuss the full circumstances of these applicants with your International Sales Manager before submission.

Afghanistan	French Southern Territories	Mayotte	South Sudan
Aland Islands	Guadeloupe	Myanmar	St. Helena Ascension & Tristan Da Cunha
Antartica	Heard Islands	Nicaragua	Sudan
Belarus	Iran, Islamic Republic of	North Korea	Syria
Bouvet Island	Iraq	Pitcairn	Yemen
British Indian Ocean Terrority	Israel	Reunion	Zimbabwe
Cuba	Lebanon	Russian Federation	
Eritrea	Libya	Somalia	
French Guiana	Martinique	South Georgia & The South Sandwich Islands	

High Risk Category by Occupation

If your clients work within any of the following industries, they will be considered high risk.

- Adult entertainment
- Advocates/Law firms/Attorneys or any Company or Individual connected in providing legal services
- Agricultural companies/Farming companies
- Aircraft dealers
- Alcohol stores or Liquor stores
- Arms
- Arts & Antiquities
- ATM service providers
- Auction services and websites
- Call centres
- CBD & legal cannabis business
- Charity business/Non-Profit Organisations
- Churches or any religious organisation
- Construction companies
- Consulting
- Convenience store
- Crypto currency/Virtual assets
- Dating websites
- Financial Firms/Accountants/Chartered Accountants
- Gambling/Online casino/Betting
- Influencers/online coaches
- Mining, Precious stones and Metals
- Money transfer services
- Online pharmacy
- Other cash intensive business
- Precious metal/Jewellery store
- Real estate
- Seafarer
- Transport/Logistics
- Travel agencies for Travel websites
- Vehicle sales

Special AML Guidance for Seafarers

Proof of Address (POA): People working at Sea

If your client's occupation is seafarer, it is essential that your client provides **TWO** of the following items as proof of their employment/address on board the yacht:

- **An original letter verifying their residence on the yacht**, certified (*) and addressed to Novia on the yacht's/yacht management company's headed paper or have the boat stamp affixed. A template is available.
- **A signed copy of their employment contract**, certified (*) with the words 'Certified as a true copy', then signed, dated and boat stamp affixed.
- If their Captain or First Officer are certifying their documents, please also enclose a **copy of their Seaman's book or Certificate of Competency** so we can verify their signature.

* Their **Captain or First Officer can certify** their documents in addition to an **approved agent**. All certification signatures must be the original.

All employment confirmation **must confirm** the following details:

- How long the employee has been known to the employer
- Duration of employment
- Salary – how much, how paid, when and by whom or salary – amount, frequency, payer's details, and method of payment
- The name of the company employing the applicant

High risk – Politically Exposed People (PEPs)

- Heads of State
- Heads of Government
- Members of national government or of the European Commission
- Members of a national parliament or of the European Parliament
- Members of governing bodies of political parties
- Members of a supreme court, constitutional court, or other high level judicial bodies
- Members of a court of auditors
- The Head or a member of the management board of a central bank
- Ambassadors, charges d'affairs, general consuls and career consuls
- General Officer or High Rank Officer in the armed forces
- Members of administrative, management or supervisory bodies of a state
- Heads of local authorities: presidents of general/regional councils, mayors of capital cities or of large regional cities having 100,000 inhabitants
- Senior Officers in the police force
- Senior post-holders in the judiciary system
- Senior national and regional civil servants
- National trade union representatives
- Clients who are affiliated with a politically exposed person, an individual or close family or friend who is entrusted with prominent public functions.
- A family member of a PEP includes a spouse or civil partner, child of the PEP and their spouses or civil partners, and parents of the PEP.
- A known close associate of a PEP means an individual known to have joint beneficial ownership of a legal entity or any other close business relationship,
- An individual who has sole beneficial ownership of a legal entity known to have been set up for the benefit of the PEP.
- We run detailed checks that will identify if a potential applicant is registered as a PEP.

High Risk: Monetary Value

Clients who make a transaction which is over the equivalence of £500,000 in sterling are considered high risk.

Failure to provide this documentation will result in us being unable to accept the client onto our service.