

## CLIENT DUE DILIGENCE

### IMPORTANT DOCUMENTATION REQUIRED

In accordance with legislation (in particular the Proceeds of Crime Act, Serious Organised Crime and Police Act and Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations) it is this firm's policy to fully identify all clients, verify their identity and if applicable identify their source of funds. This procedure is known as client due diligence.

**We cannot commence work for you until you have provided to us the following documentation.**

If you are an existing client who is reinstructing us to act for you, we may need to ask for up to date identification should the identification we hold for you be out of date. We may also need to redo your online verification check should the one we hold for you be over 12 months old or if your details have changed significantly.

#### Identification for individuals

This involves clients providing us with proof of their full name(s), residential address(es) and date of birth. We would be grateful if you could please personally supply us with ONE original document from list A and ONE original document from list B below so that we can take a photocopy for our records.

#### One from this list

##### List A

- current valid passport
- current valid photocard driving licence
- identity card issued by the Electoral Office for Northern Ireland
- residents permit issued by the Home Office to EU Nationals on right of their own country passport

AND

#### One from this list

##### List B

- utility bill (dated within the last 3 months) (not a mobile phone bill)
- recent evidence of entitlement to state or local authority-funded benefit such as housing benefit, council tax benefit, pension, tax credit letter (dated within the last 3 months)
- inland revenue tax notification (dated within the last 3 months) - record of home visits
- bank or building society statement containing your current residential address (dated within the last 3 months) (not a credit card statement)
- confirmation from the electoral roll that a person of that name lives at that address (dated within the last 3 months)
- mortgage statement from a recognised lender (dated within the last 3 months)

#### Exeter

21/22 Southernhay East, Exeter, Devon EX1 1QQ  
☎ 01392 285000

#### Cullompton

38 High Street, Cullompton, Devon EX15 1AE  
☎ 01884 33818

#### Newton Abbot

66 Queen Street, Newton Abbot, Devon TQ12 2ER  
☎ 01626 330127

## Please note:

- any bills, statements, etc should be no more than 3 months old
- if you receive your utility bills online, we will accept a pdf download of the same providing they show your name, current address and are dated within the past 3 months
- documents provided must be the original and not a copy. If this is not possible please ask us for further guidance
- we require one document from each list (both a and b)
- please do not send identity documents in the post
- if you have lived in your current address for less than 3 years please provide details of the previous addresses for that period. You do not need to provide documentary proof for the same

## In the absence of photographic identification

If you do not hold any of the documents in List A please ask us for further guidance. Examples of additional documents that we may be able to accept subject to prior approval of the firms Money Laundering Reporting officer are:

- old style driving licence
- government issued document such as a DWP entitlement letter, recent evidence of entitlement to state or local authority-funded benefit such as housing benefit, council tax benefit, pension, tax credit letter (all must be dated within the past 3 months)
- valid blue disability badge for a car

## Identification for companies

Please provide evidence of identity and address, in accordance with the requirements for individuals as above, for: at least one director of the company and; any shareholder that holds more than 25% shares. Please also supply the original or a certified copy of the Certificate of Incorporation or Certificate of Incorporation on change of name of the company.

## Third party documentation certification

We will only accept certified copies from another firm of lawyers. The person certifying your ID must be registered with their appropriate governing body. Should you have your ID certified by a third party, we require confirmation of both a true copy of the document (for both List A and List B documentation) and a true likeness of the photograph to yourself (for List A documentation only) which means that you will need to be in the presence of the third party when they are certifying a true likeness. The following wording should be used on the certified copy in these circumstances: "We hereby certify this to be a true copy of the original" and "I hereby certify this document has been checked as true likeness" along with the certifying firm's stamp / full details. Please check with us before you get certified copies so we can check that the certifying firm is on the necessary registers and provide further information on our guidelines. We will not accept certified copies from any other profession without prior approval.

## Identification verification

Upon instructing this firm you are authorising us to carry out our client due diligence procedure. Part of this procedure involves using a third party identity verification company to check the information you have provided us with against a number of institutions records including, passport checking, DVLA, sanctions records, politically exposed persons records, mortality, insolvency lists and credit reference data. Please note checking against credit reference data will result in an electronic ID check footprint being left on the search subject's credit reference file. However, this footprint does not adversely affect a credit reference file and is not used by lenders to inform credit decisions.

## Source of funds

If you pass funds to Dunn & Baker as part of a matter transaction, we are required to ascertain the source of those funds. It is this firm's policy to ask each client, where applicable, to provide a brief explanation and some supporting documentation of the identity of their source of funds. If any part of the funds have been provided by a third party then, where applicable, we will need to ask the third party to provide us with a brief explanation and some supporting documentation to support the identity of their source of funds. If at any point in the transaction the origin of the funds change, we will also require a brief explanation and supporting documentation of the identity of that source of funds.

Examples of such documentation include:

- 6 months' worth of bank statements. If the money was passed to you from a third party then we will also need the third party to provide 6 months' worth of statements
- filed business accounts
- information confirming the sale of a house or shares
- confirmation of inheritance or judicial award
- confirmation of redundancy settlement from the related employer or administrators

The team member entrusted with your matter will speak with you about the documentation you will be required to provide. Until we have received satisfactory evidence of the source of the funds we will not be able to conclude the matter. If such delay causes a postponement or delay to completion and a resulting breach of the contract, we at Dunn & Baker will not be liable nor accept liability for any loss howsoever arising if such postponement/delay/breach of contract arises for which you are held to be liable in costs.

Please note, due to current cryptocurrency verification limitations, this firm will not accept instructions on matters funded in any way with funds obtained through cryptocurrency.

Many thanks for your assistance.

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