



Matter:

Date: 31 August 2023

Dear,

Money Laundering and Identification Regulations

Money Laundering Precautions

As part of our Anti-Money Laundering (AML) requirements, we must complete ID verifications on each individual involved in your matter. We class an individual as being involved in the matter if you wish them to be able to speak with us regarding the matter or anyone involved in a financial way. Some examples are listed below:

- Anyone to be named or currently named on the deeds to a property related transaction
- Family/friends gifting money towards house purchase
- Attorneys named on Power of Attorney
- Beneficiaries to an estate.

This list is not exhaustive so if you aren't sure whether or not you need to list an individual, please contact us and we will be able to assist in determining whether we will need to obtain information for the person(s). If you are a business/organisation, we will need to prove that you have the authority to instruct us on behalf of the entity, we will need a signed letter or authority from any person with a 25% or more share in the organisation. In addition to this we will need each of these individuals to complete the ID verification.

One way we minimise the risk of money laundering is by knowing where funds are coming from - because of this our preferred method of receiving payment is via bank transfer or debit / credit card. In the same way if funds are owed to you as a client or a business on your behalf, we usually do this by way of bank transfer, speak to us if this will cause any issues. If we suspect that funds large or small being used for a transaction have come from proceeds of crime, we have an obligation to report this to the NCA (National Crime Agency) this may result in police and / or HMRC (HM Revenue & Customs) investigation; If you are concerned about how this may affect you, please speak with us.

Identity & Money Laundering Checks

The main way in which we reduce the risk of Money Laundering is to conduct electronic checks with our AML partner, Veriphy. Please note we are unable to complete any work on your matter until such time as we have satisfied the verification process for every individual. To complete the electronic ID verification, you must be 18 or over - everyone will need to complete a two-step process and have access to:

- Access to a smartphone or tablet with camera.
- Valid Passport (Any Country) or Valid UK Photocard Driving License (We cannot accept paper licenses.)
- Two separate forms of Address ID for each individual dated within the last 90 days (3 months) o i.e. Utility Bill, Bank Statement, Letter from Government Body/Organisation.

If you do not have access to a smartphone/tablet or don't have a Passport/Driving License or are under 18, you will need to verify your ID in person. Both processes are detailed overleaf along with acceptable forms of ID.

Verifying your Identity electronically

- 1. First, we need to know some basic information about everyone, and you'll need to provide us with two letters addressed to you at your home address (this helps us to prove you are). We need to know:
 - a. Your full name, your current address (and your previous if you have moved in the last 12 months or are not yet registered for banking and utilities at your new address) date of birth, contact telephone, email address and your National Insurance number.
 - b. You need to provide us with two letters addressed to you at home in the last 3 months (Address ID) to help prove you live at the address and are who you say you are.

The letter must be issued by a recognised entity such as a Bank, Utility company, Council or Government Department or a company regulated by the Financial Conduct Authority. The letters must contain:

- i. Your name
- ii. Address
- iii. Date of issue (must be less than 90 days/3 months)
- iv. Name/logo of issuing entity

We understand a lot of clients receive paperless statements and bills, in this instance we recommend logging onto online banking and downloading a statement or sending us recently emailed Utility (Gas/Water/Electricity/TV/Broadband/Phone) bill.

There are two ways you can give us this information:

a. The guickest and easiest way to do this is via our website.

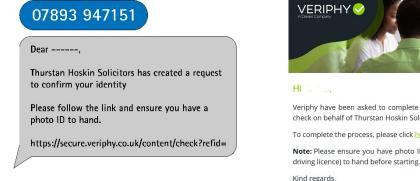
Visit www.thurstanhoskin.co.uk/id-upload and follow the instructions, you will need to have two scanned or downloaded Address IDs to send to us as PDF or JPEG files.





🔒 thurstanhoskin.co.uk/id-upload

- b. Complete the form enclosed with details of every individual involved in the matter and return it alongside two forms of address ID for everyone with the signed Terms of Business.
 - i. If you require more, please let us know and we will send you some or alternatively you can use a mix of paper forms and digital uploads via the website.
- 2. Once retuned you will receive a text and email notification from our Photo ID partner Veriphy, this may take up to 14 business days but usually arrives within a week. You will need your valid UK Photocard Driving license or Passport (any country) to hand to complete the check. It will ask you to take a photo of your ID and take a live selfie, so, you must have a smartphone or tablet with a camera





Click the link from the email or text and follow the instructions on the webpage, you can check the site is secure by looking for the padlock in the URL bar. The link will be followed by a combination of letters, numbers, and dashes after the =

The Veriphy Team

secure.veriphy.co.uk/content/check?refid=

Verifying your Identity in-person (18+)

If you do not have a smartphone/tablet or Passport/Driving License, you will need to verify your ID in-person at our Redruth office, please still complete and return the form overleaf but tick the box for in-person ID verification. Our Redruth reception is open Monday - Friday, 9.00 am - 5.15 pm. If you wish to present your ID to our St Agnes or Hayle office, you will need to telephone and book an appointment in advance to ensure there is someone available to certify the documents.

Each client who chooses to verify their ID in-person at our office will need to present their own set of ID, we cannot accept your ID if someone else brings it into our office. You will need to bring the following documents.

- Valid photographic ID see acceptable forms of ID below
- Two separate forms of Address ID see acceptable forms of ID below

Verifying your Identity in-person (Under 18s)

Under 18s need to verify their identity in-person with their Parent/Guardian present. If available, we will need to see a form of official Photo ID such as Passport, Provisional Driving License or PASS stamped Photo ID card - School & Bus pass ID's are not acceptable.

We will also require a certified copy of the Birth certificate (we can create one if you have the original) & two copies of Address ID. We would recommend School/College letters or bank letters as Address ID, we could also accept letters from NS&I Premium bonds, If you are struggling to collate any of the required documents please check the help section on the next page.

Acceptable forms of Photographic ID

Acceptable photo ID - Must be in date

Photo card driving license issued by the UK DVLA (We do not accept paper licenses)

Passport (any county)

Biometric residence permit (issued by UK or EU country)

UK issued PASS stamped ID card (Citizen Card or Post Office ID)

UK photocard bus pass or blue parking badge (both sides)

UK Firearms or Military photo ID card

CSCS Blue or above

Only a UK Photocard Driving License OR a Passport issued by ANY country can be used for the electronic verification process. If you do not have either of these, you will need to confirm your ID in-person as detailed above.

Address ID - Must be dated in the last 90 days Must contain clients name, address & logo or name of issuing entity

Bank Statement/Credit Statement

Utility Bill (Gas/Water/Electric/TV/Broadband)

Council Tax letter

HMRC, DWP, or other local authority/government department

If you receive paperless statements, we can accept downloaded and printed copies

If you are struggling to obtain any of the required ID documents, please check the next page for a help list or contact us on 01209 213 646.

Businesses, Charities & Other Entities

Depending on the set up of your organisation we will need sufficient ID for each member as listed.

Registered Companies - Your Companies House registration number along with full ID as described on page one for each registered Officer.

Partnerships - Proof of address and registration of the Partnership, along with full ID as described on page one for each Partner.

Charities - Your registration number and proof of registered status, along with full ID as described on page one for each Officer, Trustee and/or Partner.

Private Limited Companies - Proof of registration on the Stock exchange along with full ID as described on page one for the individual handling the matter, & a letter of Authority from the Board of Directors.

Government Body/Organisation - Proof of status, alongside full ID as described on page one for the individual dealing with the matter, & a letter of authority from the Organisation/Body.

Banks & Other regulated Financial Institutes/Organisations - Proof or regulation by FCA & of Company registration, along with full ID as described on page one for the individual handling the matter, & a letter of Authority from the Board of Directors.

<u>Help sheet</u>

We understand there may be some circumstances where clients, particularly our elderly clients and those under 18, do not have any form of valid Photo ID and/or Address ID.

I Have no Valid Photo ID

- If you have an old Photo ID document which expired less than 12 months ago but the details are all correct this can be provided but we will require an explanation as to why the document has not been renewed.
- The Post Office & Citizen Card both offer a service for individuals with no form of Photo ID to obtain one, it costs £15. You can ask in your local Post office or read more and apply online, both of these cards are acceptable forms of Photo ID anywhere in the UK. <u>https://www.postoffice.co.uk/identity/pass-card</u>

 <u>https://www.citizencard.com/apply-for-a-uk-id-card-online</u>

Clients in Care homes

For clients in care homes who do not have any form of Photo ID we can accept a signed letter from the manager of the care home confirming the resident's identity and residence, this could also be backed up from a letter by their GP or other medial professional.

Elderly Clients

For elderly clients who do not have any form of Photo ID we can accept a signed letter from their GP, other medical professional, or Bank Branch Manager confirming their identity and/or address.

Under 18s

- Many schools and colleges have discount codes and partnerships with Citizen Card meaning you can get a free Photo ID even if you don't have any other Photo ID to prove your identity, see the I Have no Photo ID section above.

I have no Address ID

- If you receive paperless bills and statements, we can accept digital copies emailed or downloaded from your online accounts, the easiest way to give us these is by completing the electronic ID form on our website www.thurstanhoskin.co.uk/id-upload