

# Anti Money Laundering (AML) Guidelines

SEB

## For Customer Due Diligence (CDD) of Pension Schemes; Self Invested Pension Plans (SIPPs) and Qualifying Recognised Overseas Pension Schemes (QROPS)

To comply with applicable law, SEB Life International must obtain the following AML documents in respect of SIPP & QROPS and may, in its discretion, also require them at other intervals.

**PLEASE NOTE:** that SEB Life International cannot enter into a business relationship or commence a transaction with a customer until all identification and verification documents that SEB Life International requires have been received by SEB Life International and are acceptable to it in its absolute discretion. We will also require information in relation to payment sources.

### 1. CDD FOR THE PENSION SCHEME (SIPP/QROPS)

- 1.1. Certified true copy of the constitutional/formation document, e.g. trust deed
- 1.2. Certified true copy of Evidence of Scheme approval from the relevant Revenue Authorities
- 1.3. Original or Certified true copy of the current Authorised Signatory list

The above must contain the following information, if not, additional documents must be provided;

- 1.4. Full name of pension scheme
- 1.5. Registered office address of the pension scheme
- 1.6. Details of controllers

### 2. CDD FOR THE TRUSTEE (LEGAL ENTITY)

#### **Identification Information**

SEB Life International must identify you as the customer and verify the following information on the basis of documentation obtained from a reliable and independent source:

- 2.1. full name;
- 2.2. registered number;
- 2.3. registered office address in country of incorporation;
- 2.4. principal business address;
- 2.5. legal form of entity;
- 2.6. nature of the business;
- 2.7. that the entity is in operation and has not discontinued as a going concern

\* For CDD requirements for legal entities, please request a copy of the Anti Money Laundering Guidelines for legal entities.

and for private companies and unlisted companies;

- 2.8. the full names of the directors;
- 2.9. the full names of beneficial owners (natural persons) with greater than 25% of the shares or voting rights or who otherwise exercise control.

**Documentary Verification:**

The documentary verification listed below and potentially equivalent documentation in other admissible jurisdictions are considered valid to verify the required information.

- 2.10. the company's Certificate of Incorporation;
- 2.11. memorandum and articles of association;
- 2.12. current extract from the local companies registration list;
- 2.13. current audited reports and accounts;
- 2.14. current authorised signatory list / duly approved current mandate;
- 2.15. share register or share certificate(s);
- 2.16. Declaration of Beneficial Ownership form accompanied by the company organisation chart

In addition to verification of information, verification of identity must also be provided for the following, in accordance with requirements for legal entities or individual

- 2.17. the ultimate beneficial owner(s);
- 2.18. one director and one signatory **OR** two directors

**PLEASE NOTE:** where there is more than one beneficial owner AML documents must be provided for all parties.

**3. CDD FOR THE PENSION SCHEME (SIPP/QROPS) INDIVIDUAL MEMBER**

To comply with applicable law, SEB Life International must obtain and renew (as required) the following AML documents in respect of the Individual Member where any of the following events occurs and may, in its discretion, also require them at other intervals:

- (1) all premium payments (new and additional);
- (2) establishment of a regular withdrawal;
- (3) partial withdrawal;
- (4) full withdrawal;

SEB Life International must be provided with the following information

- (1) full name (first and last);
- (2) date of birth;
- (3) signature;
- (4) current residential address.

This information **must** be verified using one photo identification document (ID) **and also** one non-photo ID. The table below shows documents considered reliable for this purpose.

<b>YOU MUST PROVIDE A <u>CERTIFIED</u> COPY OF ONE DOCUMENT FROM COLUMN A <u>AND</u> ONE DOCUMENT FROM COLUMN B.</b>	
<b>Column A</b>	<b>Column B</b>
<b>Photo ID (showing full name and clear photo)</b>	<b>Non-photo ID</b>
Current valid passport	Current statement or letter issued by bank, building society or other financial institution that is a designated person in an EEA member state (including those printed from the internet) that is relied upon for AML purposes in that EEA member state
Current valid driving licence	Current utility bills ( <i>including those printed from the internet</i> ). Mobile phone bills are not acceptable
Current valid national identity card	Current document issued by a central or local government authority of an EEA member state that is relied upon for AML purposes in that EEA member state and is acceptable to SEB Life International in its absolute discretion
	Current official documentation issued by the Government tax authority of an EEA member state and addressed to the individual
	Current official documentation issued by the Government Department of Social Welfare of an EEA member state and addressed to the individual
	Current household/motor insurance certificate and renewal notice (both documents required) where issued by an insurer authorised in an EEA member state that is relied upon for AML purposes in that EEA member state
	Current instrument of a court appointment from an EEA member state court (such as liquidator or grant of probate)

The term 'current' means, where a Photo or Non-photo ID has a specific expiry date that such date has not passed (i.e. not expired). Where it is clear that there is no expiry date, **the document must have been issued within the previous 6 months**. In the case of an official document with a renewal frequency of greater than 6 months, such documents may be accepted during that period, to a maximum of 12 months.

## Politically Exposed Persons (PEPs)

Politically Exposed Persons (PEPs) are individuals who are or have been entrusted with prominent public functions, their immediate family members, or known close associates.

PEPs are seen to pose a higher risk of money laundering than non-PEPs as their position potentially leaves them more vulnerable to corruption (bribery, embezzlement etc.). PEP status itself does not in any way incriminate individuals or entities; it does, however, put them into this higher risk category.

An individual ceases to be considered a PEP 18 months after he or she has left office.

Examples of **prominent public functions** include:

- a) heads of state, heads of government ministers and deputy or assistant ministers;
- b) members of parliament or similar legislative bodies;
- c) members of the governing bodies of political parties;
- d) members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions which are not subject to further appeal, except in exceptional circumstances;
- e) members of courts of auditors or of the boards of central banks;
- f) ambassadors, chargés d'affaires and high-ranking officers in the armed forces;
- g) members of the administrative, management or supervisory bodies of State owned enterprises;
- h) directors, deputy directors and members of the board or equivalent function of an international organisation.

**Note:** No public function referred to in points (a) to (h) shall be understood as covering middle-ranking or more junior officials.

**Family members** include individuals who are related to a PEP either directly (blood relatives) or through marriage or similar (civil) forms of partnership.

Examples of **known close associates** include:

- Any individual who has joint beneficial ownership of a legal entity or legal arrangement, or any other close business relations, with the PEP;
- Any individual who has sole beneficial ownership of a legal entity or legal arrangement set up for the actual benefit of the PEP.

If you belong to any of the above categories you are considered to be a Politically Exposed Person (PEP).

SEB Life International is required to take steps to determine whether or not a customer (or a beneficial owner connected with the customer or service concerned) is a PEP, an immediate family member, or a close associate, of a PEP. As a result some customers may be required to provide additional information and/or documentation to SEB Life International.

## CERTIFICATION OF DOCUMENTATION

SEB Life International requires, the regulated insurance intermediary (1) to conduct face-to-face contact with his/her clients and (2) to certify the documentation.

When certifying documentation, the certifier must certify that the documentation being provided to SEB Life International is a certified copy of a sighted original (and include the certifier's regulatory reference number). The certificate should also include the following details: name of certifier; address of certifier; capacity of certifier; the certifier's signature; and the date of certification. Where available, an official stamp should accompany the certificate.

SEB Life International will also accept certification from the following persons provided the form of certification accords with the requirements outlined above: (1) a regulated financial or credit institution in an EEA member state; (2) a practising chartered or certified accountant; (3) a practising solicitor; (4) a serving notary public; (5) the local equivalent in an EEA member state of a serving 'Commissioner for Oaths'; (6) a serving police officer.

### IMPORTANT NOTE:

This document is intended by way of general guidance only. The list of documents required may change from time to time and such changes may be advised by general circular or otherwise. In any one instance SEB Life International may require that additional or alternative documentation to that identified in this guide is approved, including but not limited to the situation where a person is identified by SEB Life International as requiring enhanced CDD. Our normal terms and conditions continue to apply. SEB Life International reserves the right not to enter into any (and/or any additional) transaction.

Postal address: SEB Life International,  
Bloodstone Building, Riverside IV, Sir  
John Rogerson's Quay, Dublin 2, Ireland  
Switchboard: +353 1 487 07 00  
Fax: +353 1 487 07 04  
E-mail us at: sales@seb.ie

SEB Life International Assurance Company Designated Activity Company trading as SEB Life International is regulated by the Central Bank of Ireland. Registered in the Republic of Ireland. Registered office: SEB Life International, Bloodstone Building, Riverside IV, Sir John Rogerson's Quay, Dublin 2, Ireland. Registration number 218391. Past performance is not a reliable guide to future performance. The value of investments may go down as well as up. All information is correct as at August 2017 but is subject to change.