

# Source of funds procedure

## Guidance notes for all products

This document sets out Friends Provident International Limited's (FPIL) source of funds procedures, including what documentary evidence is required to support the source of funds information supplied in the application form.

Source of funds includes both the activity that generated the funds as well as the means through which the funds have been transferred.

The current legislation and guidance requires all Isle of Man Companies to "take reasonable measures to establish the source of funds for all customers when entering a new business relationship". This reflects the Isle of Man's commitment to maintain the highest possible standards of business practice and to counter money laundering and the financing of terrorism.

FPIL has adopted a risk-based approach to comply with current legislation and guidance by risk rating each client as representing Standard, Higher or High risk. This depends on the product they are applying for, the jurisdiction they are based in and the jurisdiction where the payment is to be transferred from. We have categorised each jurisdiction according to their level of compliance with international regulatory standards.

Please be aware that the countries listed in this document are subject to change with immediate effect at the absolute discretion of FPIL.

### **Important**

The inclusion of a country on this list does not signify that FPIL will accept business from that country.

FPIL reserves the right to request further documentary evidence at any time.

## Standard risk

To qualify as standard risk business the client must be one of the following:

- applying for a regular payment plan
- applying for a lump sum investment and is both resident in a standard risk country and sending their payment from a standard risk country
- a regulated trust/pension company

For standard risk business no documentary evidence is required.

Standard risk countries			
Albania	Andorra	Anguilla	Antigua & Barbuda
Argentina	Armenia	Aruba	Australia
Austria	Azerbaijan	Bahamas	Bahrain
Bangladesh	Belgium	Belize	Bermuda
Bhutan	Bosnia and Herzegovina	Botswana	Brazil
British Virgin Islands	Brunei	Cambodia	Canada
Chile	China	Colombia	Cook Islands
Costa Rica	Cyprus	Czech Republic	Denmark
Dominica	Dominican Republic	East timor	Ecuador
El Salvador	Estonia	Fiji	Finland
France	Gambia	Georgia	Germany
Ghana	Greece	Grenada	Guatemala
Guernsey	Guyana	Honduras	Hong Kong
Hungary	Iceland	India	Indonesia
Ireland	Isle of Man	Israel	Italy
Japan	Jersey	Jordan	Kazakhstan
Korea (South)	Kosovo	Kuwait	Latvia
Liechtenstein	Lithuania	Luxembourg	Macau
Macedonia	Malawi	Malaysia	Malta
Marshall Islands	Mauritius	Mexico	Micronesia
Monaco	Mongolia	Montenegro	Morocco
Namibia	Netherlands	New Zealand	Nicaragua
Norway	Oman	Panama	Paraguay
Peru	Poland	Portugal	Puerto Rico
Qatar	Romania	Rwanda	Saint Lucia
Saint Vincent and Grenadines	Samoa	San Marino	Saudi Arabia
Serbia	Seychelles	Singapore	Slovakia
Slovenia	Spain	Sri Lanka	Sweden
Switzerland	Taiwan	Thailand	Trinidad and Tobago
Tunisia	Turks and Caicos Islands	United Arab Emirates	United Kingdom
Uruguay	USA	Uzbekistan	Vanuatu
Vatican City	Zambia		

## Higher risk

Documentary evidence of source of funds must be supplied for higher risk business.

A client will be categorised as higher risk if they are applying for a lump sum investment and are either:

- resident in a higher risk country; or
- sending their payment from a higher risk country

Higher risk countries			
Afghanistan	Algeria	Angola	Barbados
Belarus	Benin	Bolivia	Bulgaria
Burkina Faso	Burundi	Cameroon	Cape Verde
Cayman Islands	Central African Republic	Chad	Comoros
Congo (Democratic Republic)	Congo (Republic of)	Cote d'Ivoire/Ivory Coast	Croatia
Cuba	Djibouti	Egypt	Equatorial Guinea
Eritrea	Eswatini (Swaziland)	Ethiopia	Gabon
Gibraltar	Guinea	Guinea Bissau	Haiti
Iraq	Jamaica	Kenya	Kyrgyzstan
Lao PDR/Laos	Lebanon	Lesotho	Liberia
Libya	Madagascar	Maldives	Mali
Mauritania	Moldova	Montserrat	Mozambique
Nepal	Niger	Nigeria	Pakistan
Palestine	Papua New Guinea	Philippines	Russia
Sao Tome and Principe	Senegal	Sierra Leone	Soloman Islands
Somalia	South Africa	South Sudan	Sudan
Suriname	Syria	Tajikistan	Tanzania
Togo	Tonga	Turkey	Turkmenistan
Uganda	Ukraine	Venezuela	Vietnam
Yemen	Zimbabwe		

## High risk

Where the client is classified as a PEP (politically exposed person) they must supply both source of funds evidence and also their entire source of wealth by completing the supplementary "source of wealth" form.

## Suggested documentary evidence for source of funds for higher or high risk categorised business

Generic description of Source of Funds	Details required in application form	Additional documentation
Lottery/betting/casino win	Date of win Total amount Details of which organisation	Letter from relevant organisation (Lottery headquarters/betting shop/casino) Or Certified copy of bank statement clearly showing the receipt of winnings Copies of media coverage (if applicable) as supporting evidence
Property sale	Address of property Date of sale Total amount received	Signed letter from solicitor Or Signed letter from estate agent (if applicable) Or Certified copy of completion contract
Inheritance	Received from Relationship to benefactor Date received Total amount received	Grant of Probate (with a copy of the will) which must include the value of the estate. Or Solicitor's letter
Company sale	Name of company Date of sale Total amount received Principal activity of company Applicant's share of sale proceeds	Signed letter from a solicitor Or Signed letter from regulated accountant Copies of media coverage (if applicable) as supporting evidence
Geared loan	Date of loan Total amount Name and nature of loan provider	Certified copy of loan agreement Or Certified copies of loan statements
Gift	Date received Total amount received Reason for gift Relationship to benefactor	Letter from Donor confirming details of gift and acknowledging the source of the donated funds Verification of the identity of Donor Donor's source of funds – requirements of evidence as stated above for each source of funds given.
Income from Employment Normal and/or bonus	Annual income for the last 2 years Name of employer Nature of employers business	Last 3 months' payslips Or Confirmation from employer of income Or Copy of recent accounts if self employed Or Bank statement that clearly shows receipt of the most recent three months' regular salary payments from the named employer.

Generic description of Source of Funds	Details required in application form	Additional documentation
Other income	Nature of the Income From who Total amount received Date received	Dependent of source of other income e.g. Maintenance payment: then copy of court order Or Certified copies of supporting documentation Or Signed letter detailing funds from a regulated accountant
Sale of shares	Date funds received From which company How long held Total amount received	Certified copy of redemption certificate
Maturing investments or policy claim	Date funds received From which company Total amount received	Certified copy of closing statement Or Letter confirming surrender
Compensation payment	Date received Total amount received Reason for payment	Solicitor's letter Court order
Company profits	Company profits for the last 2 years Industry company operates in	Copy of the latest accounts or letter from regulated accountant giving details of company profits over the last 2 years

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