



Money Laundering

Guidance for Branches - Processing and Reporting FX and Cash Transactions

1. Introduction

- 1.1. The **Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017** set out what relevant businesses must do to prevent the use of their services by criminals for **money laundering** or **terrorist financing** purposes.
- 1.2. The Society's Travel group, and more specifically its currency exchange facility (bureau de change), is classed as a **Money Service Business ("MSB")** and is **regulated by HMRC**, which supervises businesses' anti-money laundering processes and practices, as well as their compliance with the Regulations.
- 1.3. Criminals use currency exchange offices to change bulky low denomination notes into easily transported high denomination notes currency. They also often change money to facilitate further criminal activity, and to launder criminal funds by buying assets in overseas countries. They will try to identify any weakness in a currency exchange office's anti-money laundering controls in order to exploit them.
- 1.4. Criminals sometimes purchase holidays in cash to launder or spend proceeds of crime. To meet our obligations under the Criminal Finances Act 2017, the Society carries out anti-money laundering checks on all cash purchases of £5,000 or more in its Travel business.
- 1.5. **This guidance sets out the process for carrying out checks on any cash purchase in travel of £5,000 or more. This applies to both cash used to purchase holidays and foreign exchange.**
- 1.6. Failing to comply with the Money Laundering Regulations is a criminal offence.
- 1.7. This Guidance should be read in conjunction with the Society's **Money Laundering Policy**, and the **Guidance for Branches – Trading with Business Customers**.

2. Who is responsible?



2.1. The **Society's Money Laundering Reporting Officer (MLRO)** is responsible for the overarching monitoring of the Society's compliance with the Regulations, and for ensuring appropriate training is made available to colleagues.

The Society's MLRO will also report promptly to the **National Crime Agency (NCA)** any suspicious transactions carried out in any of our Travel branches, that may be suspected to be linked to money laundering or terrorist financing activities.

2.2. **Travel branches are responsible** for:

2.2.1. **Identifying potential risks** when dealing with customers' transactions

2.2.2. **reporting accurately and promptly** to the Society's MLRO all cash transactions (both holidays purchased and FX cash transactions) over £5,000, following the process described in this Guidance; and

2.2.3. **contacting the Society's MLRO** when in doubt, or if further guidance is needed, before proceeding with any cash transaction over £5,000.

3. Tipping-Off

3.1. **Disclosing to the customer that you are going to report their transaction to the MLRO (or the NCA, or the Police) as "suspicious" is a criminal offence**, so you should not "tip off" the customer about your intention to report the transaction, even if that is precisely what you are going to do after they have left the branch.

3.2. **You should not refuse to carry out a transaction** on the grounds of a customer, or a transaction, looking suspicious, as long as all necessary ID and proof of address evidence have been provided.

4. How to recognise suspicious transactions or customer behaviours

4.1. Whilst carrying out an FX or cash transaction, you must **feel free to ask** as many questions as you think necessary to a customer, to ensure you are



satisfied that both the customer and the purpose of the transaction are legitimate, and to be able to complete your KYC (Know Your Customer) process correctly.

4.2. The below checklists can help you spot unusual or potentially **suspicious transactions and customer behaviours**:

For new customers

- Checking the customer's identity is proving difficult, the customer is reluctant to provide details of their identity or provides fake documents.
- The customer is trying to use intermediaries to protect their identity or hide their involvement.
- there is no apparent reason for using our business - for example, another business is better placed to handle the transaction, or closer to their residential area.
- The customer requests high denomination notes, for example €100, €200, and €500 notes or \$100 US notes.
- The customer is willing to accept poor rates of exchange.
- The destination of the transmission is suspicious.
- The customer is buying currency that doesn't fit with what the business knows about their travel destination.
- The customer wishes to exchange large volumes of low denomination notes.

For regular and existing customers

- The transaction is different from the normal type of transactions the customer would ask to do.
- The size and frequency of the transaction is different from the customer's normal pattern of transactions.
- The customer's pattern has changed since the relationship was established.
- There has been a significant or unexpected improvement in the customer's financial position.

For all customers

- A third party, apparently unconnected with the customer, bears the costs, or otherwise pays for the transaction costs



- The customer asks to do an unusually big cash or foreign currency transaction
- The customer won't disclose the source of the funds; or is unable to provide satisfactory evidence of the source of the funds; or the source of the funds is unusual.
- You notice an unexplainable involvement of third parties, or large payments from private funds, particularly where the customer appears to have a low income.

5. Need more help?

5.1. This Guidance document, and the enclosed ***Useful Questions & Answers***, should be sufficient to help you decide what to monitor when you carry out any cash transactions, and how to properly report transactions.

5.2. However, if you are in doubt, always consult with your Manager in the first instance, or contact the Society's MLRO directly at: money-laundering@midcounties.coop, or by phone: 07548127154, **before carrying out any cash transactions over £5,000.**

6. Guidance updates

6.1. This Guidance will be reviewed by the Society's MLRO on a regular basis to ensure it remains relevant with the Society's obligations under applicable law.

Useful Questions & Answers

1) Are all high-risk transactions suspicious?

Identifying a customer or a transaction as **high risk** does not automatically mean that they're involved in money laundering or terrorist financing. Equally, identifying a customer or transaction as **low risk** does not mean that they're not involved in money laundering or terrorist financing; in most cases, alertness and common sense should guide you on a case-by-case basis.

2) What transactions do we need to monitor?

The Money Laundering Regulations require that organisations monitor transactions of €15,000 or more in one single transaction, or a series of transactions by the same individual(s) totalling €15,000 or more (these are known as “**linked transactions**”). The Society has decided on a higher threshold – **all cash transactions over £5,000 must be reported to the Society's MLRO.**

You do this by logging a **Money Laundering Reporting Form**, making sure it is fully completed and sent to the Society's MLRO. **Don't forget** to enclose all required supporting evidence with the Form. **Always ensure you are using the most up-to-date reporting form** - you can obtain this from Colleagues Connect here: <https://colleaguesconnect.midcounties.coop/siteassets/quick-links/personnel-forms/money-laundering-reporting-form.pdf>.

3) What are linked transactions?

Linked transactions may be a series of transactions by a legitimate customer, or they may be transactions that appear to be independent but are in fact split into two or more transactions to avoid our detection. This typically happens when a **customer tries to avoid our controls by splitting transactions into several smaller amounts**, or perhaps using different branches, to stay below the level at which you would check their ID or enquire about the source of funds.

4) What about customers we have usual and on-going relationships with?

On-going customer relationships, whether personal or business, should continue to be monitored after they are established, as **familiarity may become a risk**



trigger. This means that you should continue to remain vigilant, **monitor the source of funds**, and ensure transactions are **consistent with what you know** about the customer and their business profile.

Cash transactions will still need to be reported to the MLRO when they are over £5,000, using the Money Laundering Reporting Form.

A separate **Guidance for Branches – Trading with Business Customers** has been issued by the Society's MLRO to the Travel group, which provides further details on **how to deal with on-going relationships with business customers.**

The Guidance document can be found on Colleagues Connect here: <https://colleaguesconnect.midcounties.coop/siteassets/working-here/people--policies/money-laundering-policy/guidance-for-branches---processing-and-reporting-fx-and-cash-transactions-june-2021-.pdf>

5) How is money laundering connected to fraud?

Criminal activity related to fraud generates money that needs to be laundered, so **where there is fraud there is money laundering.** When we think of fraud risk, we automatically think of the risk of financial loss for the Society; so, **the key question should be: is the money really there?** for example, a customer buys an expensive holiday and wants to pay by cheque; naturally, you would want to ascertain the money is there and wait for the cheque to clear before releasing tickets etc.

Likewise, for money laundering, **your key question should be: where did the money come from?** For example, a customer buys an expensive holiday, and produces £30k in cash to pay for the holiday. When completing the reporting form, you should ask why they are using cash for the purchase rather than a credit or bank card, which is more common. The risk is that the cash has not been deposited into a bank account because of the questions that may be raised as to its source by the bank. Likewise, we should ask those questions when cash in excess of £5,000 is being used to buy a holiday or FX in cash.

This is when you should apply your acquired knowledge, experience and the Society's procedure to ensure you remain compliant with anti-money laundering legislation. **It is okay to ask questions** and, if it doesn't feel right, **continue to carry out the transaction**, provided all the required ID and proof of address



evidence have been checked and copies retained. You should then complete the Reporting Form, ticking the box “suspicious transaction”, **explaining your reasons** for doing so.

6) What ID evidence and proof of address should I ask customers for?

The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 require that you obtain identity (ID) evidence and proof of address from customers when carrying out money exchange transactions.

HMRC’s recommended guidance is enclosed in **Appendix 1** for information – you will see that guidance is provided for both individual customers and business customers. If you have any doubt or require further assistance, you should talk to your Manager or contact the Society’s MLRO directly.

Remember – the same form of identification cannot be used for both ID proof and proof of address. For example, if a customer provides their driving licence as proof of identity, a different form of identification must be produced by the customer as proof of address, for example a utility bill.

7) What if I am not satisfied with the ID evidence provided by the customer?

If you are not satisfied that the customer’s identity has been adequately verified, you **must not carry out a transaction with or for the customer**, or establish a business relationship, or carry out an occasional transaction with the customer. Instead, you should explain to the customer that **additional or different ID evidence is required**, and that they are welcome to return once such evidence is available to carry out the transaction. For clarity, the essential elements to identify a customer are the **customer’s full name, residential address, DOB**, original (not photocopies, unless certified) **ID document** (passport or valid photo card driving licence) and **credit/bank account statement or recent utility bill** dated within the last three months.

8) What about non-UK resident customers?

For non-UK residents, similar customer’s identification rules apply as for UK residents, so you will need to verify the customer’s **full name, residential address, DOB** and original (not photocopies, unless certified) **passport**. If in doubt, you



should **contact the Society's MLRO for further guidance** before you carry out the transaction.

9) What are PEPs, and how should I deal with these transactions?

PEP means **Politically Exposed Person**. HMRC's guidance for money service businesses, such as the Society's Travel business, indicates that in certain situations you must carry out "**enhanced due diligence**"; for example, when you enter into a business relationship with a politically exposed person, ie. individuals, or organisations, whose prominent position in public life may make them **vulnerable to corruption, bribery, fraud and money laundering**. This would include, for instance:

- a) head of state
- b) head of government
- c) minister or deputy or assistant minister
- d) Member of Parliament
- e) member of supreme courts, or constitutional courts or of other high-level judicial bodies
- f) member of courts of auditors
- g) member of the board of a central bank
- h) ambassador, chargé d'affaires
- i) high-ranking officers in the armed forces
- j) member of the administrative, management or supervisory bodies of a state-owned enterprise.

IMPORTANT!

You must seek the **Society's MLRO approval** before completing a transaction with a PEP.

10) Should I carry out a transaction for a customer who is not present?

It is acceptable to carry out a transaction for a **customer who is acting on behalf of a third party** ie. another individual who is not present, as long as you seek to **verify the identity of both the customer acting on behalf and the third party**. If the evidence provided by the customer is not satisfactory, refer to question 7) above.

11) What are suspicious transactions?



A **suspicious transaction** is one for which there are **reasonable grounds to suspect** that the transaction is related to a money laundering offence or a terrorist activity financing offence; this generally means that you think a transaction, or a group of transactions (see question 4) above) raises questions or gives rise to discomfort, apprehension or mistrust.

There is no requirement, under money laundering legislation, to close a customer's on-going relationship or stop dealing with a customer if you suspect a transaction may be suspicious; you should instead carry out the transaction as normal – provided you have obtained **satisfactory ID evidence** and taken copies of all relevant documents – and then **report the transaction to the Society's MLRO** in the usual way, via the Money Laundering Reporting Form, **ensuring the box "suspicious transaction" is ticked.**

12) If I think a transaction is suspicious, should I tell the customer?

No, you shouldn't. It is a **criminal offence** to say or do anything that may alert a customer that a suspicion has been raised, or that a money laundering investigation may be carried out, or that the transaction may be reported to law enforcement authorities.

This offence is called **tipping-off**, and it means that you should never disclose to a customer that their transaction will be reported to the Society's MLRO as "suspicious"; or tell a customer the transaction cannot be carried out because you believe they may have criminal or fraudulent intentions.

13) Are the new money laundering regulations applicable to the Society?

Yes – the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 became effective on 26 June 2017 and has replaced The Money Laundering Regulations 2007. It is applicable to the Society in relation to its foreign currency exchange business, currently supervised by HMRC. Particularly for Money Service Businesses, such as our Travel branches, the Regulations focuses on **customer due diligence, reporting obligations, record-keeping and internal controls.**

Branches should ensure they continue to apply the correct customer due diligence and reporting procedures as explained in this Guidance.



14) Who should I contact if I need further assistance, or to obtain a copy of the Society's Money Laundering Policy and other available guidance for colleagues?

All policies and procedures are available on **Colleagues Connect** (<https://colleaguesconnect.midcounties.coop/>). The Money Laundering policy and documents are in the process of being added. In the meantime you should contact the **relevant colleagues within the Travel business**:

- Richard Simpson, Governance & Compliance Manager
richard.simpson@midcounties.coop
- David Watts-Davies, Learning & Development Manager
david.watts-davies@cooptravel.coop

Alternatively, you can contact the **Society's MLRO** directly at money-laundering@midcounties.coop; or by phone: 07548 127154. You can write to: The Midcounties Co-operative, Co-operative House, (attn. of: MLRO), Secretariat Group, Warwick Technology Centre, Warwick CV34 6DA.



Money Laundering

APPENDIX 1

HMRC GUIDANCE – PROOF OF IDENTITY

1. Proof of identity checklist for individuals

Proof of name	Proof of address
Current signed passport	Utility bill (gas, electric, satellite television, landline phone bill) issued within the last three months
Original birth certificate (UK birth certificate issued within 12 months of the date of birth in full form including those issued by UK authorities overseas such as Embassies High Commissions and HM Forces)	Local authority council tax bill for the current council tax year
EEA member state identity card (which can also be used as evidence of address if it carries this)	Current UK driving licence (but only if not used for the name evidence)
Current UK or EEA photocard driving licence	Bank, Building Society or Credit Union statement or passbook dated within the last three months
Full old-style driving licence	Original mortgage statement from a recognised lender issued for the last full year
Photographic registration cards for self-employed individuals in the construction industry -CIS4	Solicitors letter within the last three months confirming recent house purchase or land registry confirmation of address



Proof of name	Proof of address
Benefit book or original notification letter from Benefits Agency	Council or housing association rent card or tenancy agreement for the current year
Firearms or shotgun certificate	Benefit book or original notification letter from Benefits Agency (but not if used as proof of name)
Residence permit issued by the Home Office to EEA nationals on sight of own country passport	HMRC self-assessment letters or tax demand dated within the current financial year
National identity card bearing a photograph of the applicant	Electoral Register entry
	NHS Medical card or letter of confirmation from GP's practice of registration with the surgery



2. Proof of identity checklist for companies and other legal structures

Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
A partnership of non-regulated professionals (except an LLP) with six or more partners	name of partnership	Identity evidence for a) the partner responsible for the transaction and b) one other partner and c) all other individuals who (directly or indirectly)



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
		are entitled to, or control, 25% or more of the capital, profits or voting rights (see proof of identity checklist for individuals below)
	trading address	



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
	registered address (if any)	
	nature of business	
	recent audited accounts	



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
	list of all partners	
	list of all those with voting rights indicating their voting stake	



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
A partnership of regulated professionals (except an LLP) such as a firm of solicitors	entry of details held by a relevant professional body	Identity evidence for a) the lead partner, b) one other partner, and c) all other individuals who (directly or indirectly) are entitled to, or control, 25% or more of the capital, profits or voting rights (see proof of identity checklist for individuals below)



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
A trust	list of trustees	Identity evidence for a) the trustee with responsibility for the transaction, and b) one other trustee, and c) all individuals or entities who: 1) have a specific interest in 25% or more of the capital of the trust property; or 2) have control over the trust; or 3) belong to a class of person whose main interest benefits under a trust which does not entirely operate for the



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
		benefit of specific individuals (see proof of identity checklist for individuals below)
	list of beneficiaries or class of beneficiaries	



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
	copy of the trust document	
Other legal structures set up by law	any document which establishes, manages or regulates the structure	Identity evidence for all individuals or entities who: 1) are beneficiaries of 25% or more of the property where the individual beneficiaries have been determined; or 2) fall into a class of person whose main interest benefits



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
		under the structure where individuals in that class are not determined; or 3) control 25% or more of the structure or of the property under the structure (see proof of identity checklist for individuals below)



Legal structure	Corporate ID required	Individual ID required
A company (including a UK LLP) which is not listed on a regulated market such as the London Stock Exchange	copy of certificate of incorporation	Identity evidence for a) the individual dealing with the transaction and b) all other individuals or entities with 25% or more of the shares or voting rights in the company (see proof of identity checklist for individuals below)
	copy of filed audited accounts	
	details of current company officers (i.e. directors and company secretary) and shareholders	
A company (including a UK LLP) which is listed on a regulated market such as the London Stock Exchange	copy of a dated page from the website of the relevant stock exchange	Identity evidence for a) the individual dealing with the transaction and b) all other individuals who exercise management control (see proof of identity checklist for individuals below)
	photocopy of the listing in a reputable daily newspaper	
A partnership of non-regulated professionals (except an LLP) with five or less partners	none (see the separate checklist for individuals)	Identity evidence for a) the individual responsible for the transaction and b) all other individual partners (see proof of identity checklist for individuals below)
	a list of any individuals who benefit (if applicable) or a list of the classes whose main interest is served by the structure	