

# Money Laundering Compliance

## Private clients



---

SB Consulting Limited is subject to the anti-money laundering legislation found in the Proceeds of Crime Act 2002, Terrorism Act 2006, and The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

This legislation requires, inter-alia, that we obtain and hold identification for any person to whom we provide advice or other professional services.

Where the individual is instructing us either in a private capacity, or as a trustee or executor, we are required to obtain identification for that individual.

Where the individual is instructing us on behalf a company, a limited liability partnership or a trust, we are obliged to obtain identification for not only the individual but for all other persons who are entitled to more than 25% beneficial ownership of the company etc., in respect of which our services are being provided.

It is our policy to ask only once for this information to be supplied to us. We will generally interpret the absence of compliance as a positive refusal. No work will be undertaken by SB Consulting Limited on behalf of any person until the anti-money laundering compliance procedures have been met.

Identification can be supplied to us either 1) by providing us sight of the originals or 2) by providing us with photocopies (certified by another regulated person, such as a lawyer or accountant), of any two items from the following list :

- Passport
- Full UK driver's license
- Home utility bill (gas, electricity, rates) – not more than 6 months old
- EU national identity card
- Armed Forces Identity card
- Photo student identification
- NHS medical card (for persons 20 years old and under)
- Birth certificate (for persons 20 years old and under)
- HM Revenue & Customs tax notification
- Firearms or shotgun certificate
- National Insurance card

For non UK based clients, we will consider alternative forms of identification.

In all instances, it is entirely at the discretion of SB Consulting Limited to determine whether the forms of identification are satisfactory.