



ANTI-MONEY LAUNDERING GUIDELINES

Atla Fund Services Limited is regulated by the Isle of Man Financial Services Authority and is subject to Isle of Man Anti-Money Laundering & Countering the Financing of Terrorism (“**AML/CFT**”) legislation and regulations.

These guidelines set out our requirements to comply with these obligations.

Once documents are collated as per the guidelines, please send the original documents and/or certified true copy of the original documents to the Manager.

Atla Fund Services Limited (the **Manager**)
77 Parliament Street
Ramsey
Isle of Man
IM8 1AQ
Tel: (44) 01624 777407
Email: fund.services@atla.im

IDENTIFICATION REQUIREMENTS

We must verify the identity and address of certain parties connected to the investor. All documents provided must be an **original** or a **certified true copy** of the original document and must be clear and legible. The entire document must be provided. For documents that are not in English, a certified English translation must be provided which confirms the translation is accurate.

We reserve the right to request new copies or additional information if the documentation received does not meet our requirements. If you cannot provide the documentation required, you should contact us at fund.services@atla.im.

Requirements for Individuals

We require certified copy of **one proof of identity document and one proof of address document** for each person.

| PROOF OF IDENTITY | PROOF OF ADDRESS |
|--------------------------------|--|
| Valid passport | Bank, building society or mortgage or bank credit card statement, dated within the last 6 months |
| Current driving licence | Rates, council tax, utility bill dated within the last 6 months (a mobile phone bill will not be accepted) |
| Current national identity card | Current driving licence (showing address - cannot be used as "proof of address" if already used as "proof of identity") |
| | Current national identity card (showing address - cannot be used as "proof of address" if already used as "proof of identity") |
| | Correspondence from an official independent source such as a central or local government department or another Agency dated within the last 6 months |

Electronic statements or bills must be printed and certified by a suitable certifier.

Requirements for Companies

For private limited companies and public limited companies not listed on a recognised stock exchange, we require certified copy documents of the following:

CORPORATE REQUIREMENTS

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| Certificate of Incorporation or equivalent |
| Memorandum & Articles of Association or equivalent |
| Evidence of the registered office of the Company |
| Register of Directors, including Proof of Identity and Proof of Address for at least 2 Directors |
| Latest Authorised Signatory List on company headed paper, including Proof of Identity and Proof of Address for at least 2 Signatories |
| Latest Annual Report and Accounts (audited where available) |
| Register of Members or Register of Shareholders (showing a list of all shareholders as at date of application) |
| Proof of identity and address of all shareholders holding 25% or more of the issued share capital or, if no one holds 25% or more, for any majority/controlling shareholder as at the date of the application. Where a 25% holder is a holding company or trust, or nominee, proof of identity and address of its ultimate beneficial owner(s) must also be provided. |

Requirements for Trusts

We are required to identify the Trust and all relevant parties connected to the Trust. The documents we require are:

TRUST REQUIREMENTS

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| Trust Deed (or relevant extracts of the trust deed) and any subsequent deeds of appointment and retirement, or equivalent |
| For every Trustee, Settlor, Protector, Controller and any other person exercising ownership or control of the trust, the relevant identification requirements for individuals or companies must be applied |
| Current Authorised Signatory List with specimen of signature, including Proof of Identity and Proof of Address for all signatories |

Please note verification of individual beneficiaries will also be required, should a payment be requested to be paid to a beneficiary.

CERTIFICATION OF DOCUMENTS

All copies of documents provided for AML/CFT purposes must be certified by a suitable certifier. For documents with multiple pages, the certifier may complete a covering letter and attach it to the copy document, providing the letter lists the documents and states the certification applies to each of the attached document.

Certifications must be completed within the previous 6 months and the certified document must be clear and legible.

For photographic proof of identity documents: the certifier must have met the individual face-to-face and checked the photo represents a good likeness of the person. The certifier should state *'I hereby certify that this is a true copy of the original which I have seen and the photograph is a good likeness of the individual'*.

For non-photographic proof of address documents: the certifier must state *'I hereby certify that this is a true copy of the original document which I have seen'*.

The following details of the certifier must be included:

- Full name
- Job title
- Company name & address
- Regulatory body
- Signature of certifier
- Date of certification
- Contact telephone number
- Membership number

We only accept certifications from the following suitable certifiers:

SUITABLE CERTIFIERS

An accountant who is a member of a recognised professional body

Notary public, commissioner for oaths, lawyer or advocate who is a member of a recognised professional body

A director or manager of a financial institution regulated and supervised for AML/CFT purposes on the Isle of Man, UK, or any other jurisdiction that is considered to have equivalent AML/CFT standards

A financial advisor at a financial institution regulated and supervised for AML/CFT purposes located in the Isle of Man, UK or any other jurisdiction that is considered to have equivalent AML/CFT standards

An officer of an embassy, consulate or high commission of the country of issue of documentary verification of identity

A member of the judiciary, registrar, a senior civil servant, a serving UK police or customs officer

A chartered secretary who is a member of a recognised professional body

Copies of documents that do not meet our certification requirements will not be accepted. If you are unsure if your certifier meets our requirements, or you have a valid reason why you are unable to provide suitably certified documents, please contact us at fund.services@atla.im so we can advise if an alternative approach to providing the documentation may be available.