

## AML DOCUMENTATION REQUIREMENT SUPPLEMENT

### AML – Know your customer requirements

Under Irish legislation and supplemental guidance covering AML and the taxation of savings the Fund and the Administrator are required to obtain the documentation verify the identity of all new Applicants. This documentation should be provided with the Application Form. The documentation listed may not cover all applications and the Fund and the Administrator reserve the right to request additional documentation if required.

Should documents be provided in a language other than English, an English translation may be required.

In any event, redemption and dividend payments will not be processed until full AML documentation has been received on the account and the Fund and the Administrator reserve the right to take further action where full AML documentation has not been received.

Please note that the Administrator can only accept Application Forms from an entity that has legal capacity to enter into contracts on its own right and may require the constitutive document to legitimate legal status.

The Administrator employs a risk based approach to AML. This entails looking at various risk factors such as geographic risk, customer risk and Politically Exposed Person (PEP) association among other factors. There are 3 different approaches that can be taken as a result of the risk assessment, these are Simplified Customer Due Diligence (SCDD), Standard Customer Due Diligence (SDD) or Enhanced Customer Due Diligence (ECDD).

#### Simplified Customer Due Diligence (SCDD)

SCDD can be applied in instances where the jurisdiction involved and customer type is deemed lower risk from a Money Laundering and Terrorist Financing perspective. Where SCDD is applied the emphasis is more on independent verification.

Examples of where SCDD can be applied are:

1. A credit or financial institution that carries out business in an EU Member State or in a jurisdiction, which operates comparable AML/counter terrorist financing (CTF), controls
2. A company listed on a regulated market in a prescribed country.

#### Standard Customer Due Diligence (SDD)

SDD will be applied where the customer/entity investing is located in a jurisdiction deemed to have equivalent levels of AML/CTF controls as Ireland. Additionally the entity type, as a result of our risk assessment, is not deemed to be higher risk, however information on the beneficial owners and controllers is not publicly available and therefore information is required from the Applicant.

\* Subject to change in line with Irish regulatory requirements and relevant guidelines.

\*\* Document must have signature, must be in date and have clear photo.

\*\*\* Document must be recent (under 6 months old), must match Application Form and must not be a c/o or PO Box Address.

### Enhanced Customer Due Diligence (ECDD)

ECDD is applied on a risk sensitive basis in any situation, which by its nature would present a higher risk of money laundering or terrorist financing. Typically ECDD will be applied to Applicants located in higher risk jurisdiction, with a complex legal structure or where the registered shareholder or ultimate beneficial owner of the registered shareholder has been identified as a PEP.

**Please note the above is a guideline and the Administrator reserves the right to apply ECDD to any Applicant where it deems the situation warrants the approach or may request further information as it deems necessary as part of its AML verification process.**

Please see the below table detailing what is typically requested for the most common entity types under standard and enhanced due diligence.

<b>Entity Type</b>	<b>AML Documents Required* - Standard</b>	<b>AML Documents Required* - Enhanced</b>
<b>Individual</b>	Copy photo ID (copy of Passport, Driver's License or National ID Card) ** Copy of proof of residential address verification (Utility Bill, Bank or Mortgage Statement***)	Certified copy of photo ID Two certified proofs of residential address verification For PEP Applicants a source of wealth confirmation will also be required
<b>Joint Account</b>	As per the above for each account holder	As per the above for each account holder
<b>Designated Person (wholly owned subsidiary)</b>	Proof of Regulation Letter of representation Original Authorised Signatory List (ASL) including specimen signatures	
<b>Corporation</b>	Copy of Certificate of Incorporation or equivalent constituting document Identify Directors Identify ultimate beneficial owners holding 25% or more of the share, profit or voting rights	All documents required under standard Constituting document to be certified e.g. Certificate of Incorporation

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	<p>Verify identity of two Directors or one Director and one authorised signatory</p> <p>Original ASL including specimen signatures</p>	<p>Certified Memorandum and Arts or Association or equivalent</p> <p>Verify identity of all ultimate beneficial owners holding 25% or more of the share, profit or voting rights</p> <p>For PEP Applicants a Source of Wealth confirmation will also be required</p>
<b>Trust</b>	<p>Copy of Trust Deed</p> <p>Identify all Trustees</p> <p>Verify identity of two Trustees or one Trustee and one authorised signatory</p> <p>Identify Settlor(s)/Donor</p> <p>Identify all ultimate beneficial owners holding 25% or more of the trust assets</p> <p>Original ASL including Specimen Signatures</p>	<p>All documents required under standard</p> <p>Certified copy of Trust Deed</p> <p>Verify identity of Settlor(s)/Donor</p> <p>Verify identity of all beneficiaries entitled to more than 25% of the trust assets</p> <p>For PEP Applicants a Source of Wealth confirmation will also be required</p>
<b>Partnership</b>	<p>Copy Partnership Agreement</p> <p>Identify all Partners including percentage holdings</p> <p>Verify identity of general partner</p> <p>Original ASL including specimen signatures</p>	<p>All documents required under standard</p> <p>Certified copy of Partnership Agreement</p> <p>Verify identity of all Partners holding 25% of the capital</p> <p>For PEP Applicants a Source of Wealth confirmation will also be required</p>
<b>Limited Liability Company (LLC)</b>	<p>Copy Certificate of Formation or equivalent</p> <p>Identify Managing Members</p> <p>Verify identity of two Managing Members or one Managing Member and one authorised signatory</p> <p>Identify all members holding 25% or more of the share capital</p> <p>Original ASL including Specimen Signatures</p>	<p>All documents required under standard</p> <p>Certified copy of Certificate of Formation or equivalent</p> <p>Certified copy of Operating Agreement or equivalent</p> <p>Verify the identity of all members beneficially entitled to more than 25% of the entity's share capital</p>

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		For PEP Applicants a Source of Wealth confirmation will also be required
<b>USA Individual Retirement Account (IRA)</b>	Identify individual in line with individual requirements as noted above Proof of regulation for Custodian of the IRA Original ASL including specimen signatures where applicable	
<b>Fund</b>	Copy of the Offering Memorandum / Prospectus or equivalent Name and Address of Fund's Promoter and Administrator Proof of regulation for entity conducting AML checks on the fund Applicants Identify all Applicants who own more than 25% of the shares / units of the fund Original ASL including specimen signatures	Certified copy of the Offering Memorandum / Prospectus or equivalent Certified copy of Certificate of Incorporation or equivalent Verify the identity of all Applicants who own more than 25% of the share capital For PEP Applicants a Source of Wealth confirmation will also be required
<b>Pension Plan</b>	Copy of the Formation document of pension plan Identify Trustees / Directors / Governors / Board Members or equivalent Verify identity of two of the above noted in point 2 as applicable Original ASL including Specimen Signatures	All documents required under standard Certified copy of the Formation Document of the pension plan Verify identity of plan administrator <b><u>And / or</u></b> Confirmation from plan administrator that AML checks are conducted at appropriate level <b><u>And / or</u></b> Certified copy of the most recent Audited Financial Statements For PEP Applicants a Source of Wealth confirmation will also be required
	Copy of constitutional document where feasible	All documents required under standard

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<p><b>Schools, colleges or universities</b></p>	<p>Verify identity independently  Identify main officials  Verify the identity of two officials  Determine ownership of entity  Original ASL including Specimen Signatures</p>	<p>Certified copy of constitutional document where feasible  Verify identity of individuals who own or control over 25% of the entity's share capital  For PEP Applicants a Source of Wealth confirmation will also be required</p>
<p><b>Public Body</b></p>	<p>Name of the home state authority and nature of its relationship with the public body  Details of the ownership of the entity  Identify the main public body officials  Identify all persons who own or control more than 25% of the capital  Independent research of entity  Original ASL including Specimen Signatures</p>	<p>All documents required under standard  Verify identity of two officials  <b><u>And / or</u></b>  Verify identity of all persons who own or control over 25% of capital  Certified copy of the most recent Audited Financial Statements  For PEP Applicants a Source of Wealth confirmation will also be required</p>
<p><b>Charity</b></p>	<p>Independent verification of the charity as an approved body e.g. for US Charities confirmation of 501(c) status via Guidestar  <b><u>Or all points below</u></b>  Nature / purpose including nature of the funding  Identify Trustees / Directors / Governors / Board Members or equivalent  Verify identify two of the above noted in point 3 as applicable  Identify beneficiaries where ascertainable  Copy of Constitutional / Formation document  Original ASL including Specimen Signatures</p>	<p>All documents required under standard except point 1  Certified copy of Constitutional / Formation document  Certified copy of the most recent Audited Financial Statements  For PEP Applicants a Source of Wealth confirmation will also be required</p>

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**AML Information**

**Controller Detail**

As appropriate to this account, please insert below the details of all Directors / Trustees / Partners / Committee Members or Controlling person(s).

<b>Name</b>	<b>Residential Address</b>	<b>Date of Birth</b>	<b>Occupation</b>

**Ultimate Beneficial Owner Detail <sup>1</sup>**

As appropriate to this account, please insert below the details of the natural person(s) who ultimately benefit from this investment regardless of how the account is registered.

<b>Name</b>	<b>Residential Address</b>	<b>Date of Birth</b>	<b>Occupation</b>	<b>PEP Y/N <sup>2</sup></b>

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<sup>1</sup> **Ultimate Beneficial Owner** - Where no beneficial ownership information is provided, it will be assumed no beneficiary holds 25% or more of the assets of the entity.

<sup>2</sup> **Politically Exposed Person** - Is the ultimate beneficial owner a senior government, political or military official, or an immediate family member or close associate of such a person?

**PEP Section**

Where there is PEP associated with this account, please provide the following two confirmations:

**Source of Wealth**

Please insert below the details of the individual PEP's Source of Wealth, being confirmation of the economic activity which has generated the net worth of the individual

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**Source of Funds**

Please insert below details of the origin of the particular funds which are the subject of this investment and how they were acquired

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