



# First AML Standard Operating Procedure UK



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## Introduction and Overview

This document outlines how First AML UK Limited (**First AML**) conducts customer due diligence (**CDD**), and how First AML operates and interacts with its users. Unless we agree otherwise in writing, First AML's process will not deviate from what is outlined in this document.

This document is focused on First AML's due diligence service and the operating procedure. It is not intended to provide a holistic view of all the necessary information required to be included in a relevant person's AML programme e.g. AML policies, controls, and procedures – which remains the responsibility of your organisation.

The policies and procedures in this document have been developed with reference to the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (as amended), the Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Fraud Act 2010 (together with the **Regulations**).

In addition, best practice steps have been taken from the following industry guidance (together, the **Guidance**):

- Financial Crime Guide: A firm's guide to countering financial crime risks (FCG)
- Legal Sector Affinity Group (LSAG) Anti-money laundering guidance for the legal sector – 2021
- The Joint Money Laundering Steering Group (JMLSG) Guidance for the UK Financial Sector – Part I 2020
- Anti-Money Laundering Guidance for the Accountancy Sector – 2021
- Estate agency business guidance for money laundering supervision – 2021

## Revision History

Version	Date	Author	Description
0.1	22 April 2022	Jessie Mao – International Expansion Lead	Initial documentation

## 1.0 Customer due diligence

As per the requirements of the Regulations, the result of the customer risk assessments should dictate the level and extent of due diligence undertaken on a customer.

First AML will not conduct or review the risk assessment on behalf of any relevant person.

**Relevant persons should ensure to instruct First AML of the level of CDD required for each customer within the 'AML Profile' section.** Please see a link to our help centre article [here](#).

First AML will proceed with the performance of CDD based on the due diligence level instructed by the relevant person.

First AML can perform standard, enhanced, or simplified CDD. The data that is required to be collected and reviewed will depend on whether First AML is conducting standard, enhanced, or simplified CDD.

### Standard customer due diligence

By default, a relevant person will be required to conduct standard CDD. In these situations, a relevant person must:

- (a) identify the customer unless the identity of that customer is known to, and has been verified;
- (b) verify the customer's identity unless the customer's identity has already been verified; and
- (c) assess, and where appropriate obtain information on, the purpose and intended nature of the business relationship or occasional transaction.

A customer's identity for CDD consists of several aspects, including the customer's name, current and past addresses, date and place of birth, physical appearance and, if applicable, their financial circumstances.

The identity of a customer who is not a private individual consists of a combination of its constitution, its business, its legal form, and its ownership and control structure.

### Enhanced customer due diligence

Where higher risks are identified, relevant persons are required to undertake enhanced CDD, and in respect of customers with whom they have a business relationship, enhanced monitoring, to manage and mitigate the risks. Potentially higher risk situations may be influenced by:

- (a) customer risk factors, e.g. some types of company formation can be a higher risk due to the ability to conceal beneficial ownership;
- (b) country or geographic risk factors, the Regulations contain a high-risk country list and all countries present on the list must be subject to enhanced CDD; and
- (c) product, service, transaction, or delivery channel risk factors e.g., where the relevant person has not met a customer face to face this can heighten the risk.

Where a customer is assessed as carrying a higher risk, then depending on the circumstances (for example, particular features of the transaction), it will be necessary to seek additional information in respect of the customer, to be better able to judge whether or not the higher risk

that the customer is perceived to present is likely to materialise. Such additional information may include an understanding of where the customer's funds and wealth have come from.

Categories that have been specifically identified under the Regulations as requiring enhanced CDD include:

- (a) any business relationship with a person established in a high-risk third country or in relation to any relevant transaction where either of the parties is established in a high-risk third country;
- (b) where the relevant person has determined that a customer or potential customer, is a Politically Exposed Person (**PEP**), or a family member or known close associate of a PEP;
- (c) any case where the relevant person discovers that a customer has provided false or stolen identification documentation, and the relevant person proposes to continue to deal with that customer;
- (d) any case where a transaction is complex or unusually large; and
- (e) any case identified as one where there is a high risk of money laundering or terrorist financing, either by the relevant person or in information made available to the relevant person by the authorities.

Where the risks of money laundering or terrorist financing are higher, relevant persons must conduct enhanced CDD measures consistent with the risks identified.

Examples of other enhanced CDD measures that, depending on the requirements of the case, could be applied for higher-risk business relationships include:

- (a) obtaining and, where appropriate, verifying additional information about the customer and any beneficial owner;
- (b) obtaining information on the source of funds or source of wealth of the customer;
- (c) obtaining the approval of senior management to undertake the transaction, and
- (d) requiring settlement to be carried out through an account in the customer's name with a bank subject to similar CDD standards.

### **Simplified customer due diligence**

Many customers, by their nature or through what is already known about them by the relevant person, carry a lower risk of money laundering or terrorist financing. Where a relevant person has determined that a customer presents a low risk of money laundering, based on appropriate, documented evidence, simplified CDD measures may be applied.

Where a relevant person applies simplified customer diligence measures, it must:

- (a) continue to comply with the standard CDD measures but may adjust the extent, timing or type of measures undertaken to reflect simplified CDD determination; and
- (b) carry out sufficient monitoring of any business relationship or transaction which are subject to those measures to enable it to detect any unusual or suspicious transactions.

As mentioned above, First AML will not determine the level of due diligence required but will rely upon the relevant person identifying and instructing First AML as to the level of due diligence required for each customer.

Below are the default verification methods for each level of CDD.

### **1.1 Standard due diligence criteria**

First AML will conduct standard CDD when instructed to do so by the relevant person.

Standard CDD procedures will be conducted in line with the requirements of the Regulations and Guidance.

The customer type can be any of the following (but is not limited to):

- Natural person(s);
- Private limited companies and unlisted companies (the UK and overseas);
- Trusts and similar legal arrangements such as foundations and charities;
- Partnerships, including limited partnerships, Scottish limited partnerships and UK limited liability partnerships; and
- Societies, places of worship, schools, clubs and associations.

The client type will determine what information First AML collects through the due diligence process.

The overall CDD measures that must be carried out involve:

- a) identifying the customer, and verifying their identity;
- b) identifying the beneficial owners (where relevant), and verifying their identities; and
- c) identifying, assessing and, where appropriate, obtaining information about the purpose and intended nature of the business relationship or transaction.

### **1.2 Standard due diligence information collection**

First AML collects the following information to verify the customer, all beneficial owner(s) of the customer (which includes ultimate beneficial owners of non-natural customers), and those purporting to act on behalf of a customer:

Natural person(s):

- The customer's full legal name(s);
- The customer's date of birth;
- The customer's address; and
- relationship to the customer (if not the customer).

Legal entities (i.e. private limited companies):

- Corporate name;
- Company/registration number;
- Country of incorporation;
- Registered address;
- Business/correspondence address (if applicable);
- Details of directors (full name, year and month of birth and country of residence/nationality);

- Details of any other person with significant control (full name, year and month of birth and country of residence/nationality);
- Details of beneficial owners and intermediate companies at more than 25%;

A beneficial owner of a body corporate, other than a listed company, as meaning any individual who:

- exercises ultimate control over the management of the body corporate; or
- ultimately owns or controls, directly or indirectly, including through bearer shareholdings or other means, more than 25% of the shares, profits or voting rights in the body corporate; or otherwise controls the body corporate.

First AML will collect the following:

- proof of registration for the company either by downloading an excerpt from the relevant local company register or via the client. This may include one or more of the following:
  - details from the relevant company registry, confirming details of the company and the director/s and their addresses e.g. UK Companies House Company Snapshot and Confirmation Statement/Annual Returns; or
  - information from a reputable electronic verification service provider,
- details of current company officers (i.e. directors and company secretary) and shareholders; and
- Confirmation from the customer whether the company has any nominee directors, nominee shareholders or shares held in bearer form.

Where no beneficial owner holds more than 25% of the company, First AML will verify an individual that 'exercises ultimate control over the management of the body corporate'. This may be the chief executive officer or president of the group, or someone else in the executive team with high-level responsibility for the day-to-day activities of the company. First AML will record this in the 'notes' section of the relevant entity.

For incorporated societies/charities/clubs that have over four officers/trustees/board members, First AML will request a nomination from the case contact(s) to verify two individuals who have more day-to-day involvement or control over the transaction.

### **1.3 Acting on behalf**

Where a person (the intermediary, agent or representative) purports to act on behalf of the customer, First AML will:

- verify that the intermediary, agent or representative is authorised to act on your client's behalf (i.e. obtain written confirmation from your client, power of attorney documents, etc);
- identify and verify the intermediary, agent or representative of the customer; and
- verify the identity of the intermediary, agent or representative via EID&V or certified documents.

### **1.4 Enhanced due diligence criteria**

First AML will conduct enhanced CDD when instructed to do so by the relevant person.

Relevant Persons should instruct the level of CDD required for the customer within the 'AML Profile' section. Please refer to our help centre article [here](#).

Enhanced CDD procedures will be conducted in line with the requirements of the Regulations and Guidance.

### 1.5 Enhanced due diligence information collection

In addition to the standard CDD information collected, First AML may collect the following:

Natural persons:

- Source of Wealth or Source of Funds of the natural person(s)

Body corporates, e.g. private limited companies:

- Source of Wealth or Source of Funds of the body corporate(s)

Please note the relevant person must collect any additional information on the intended nature of the business relationship. First AML will not collect certified copies of Source of Wealth evidence.

Please refer to our Source of Wealth/Source of Wealth guidelines [here](#).

### 1.6 PEPs: Identification of politically exposed persons (PEPs), their relatives or close associates

A PEP is an individual or a relative/close associate of an individual who has been entrusted within the last year with prominent public functions by a public institution, an international body, or a state, including the UK, excluding any middle-ranking or more junior official.

Please refer to the [FCA guidance: FG17/6: The treatment of politically exposed persons for anti-money laundering purposes](#) for further information regarding engaging with PEPs as customers.

First AML will conduct PEP, sanctions, and adverse media checks on all beneficial owners.

A positive match is where the individual verified is an exact match with the individual flagged by our checks. The matches may be confirmed by comparing legal name, date of birth, citizenship, residency, and biometric data. The reason behind this match will be logged within the PEP Match notes.

A possible match is where the individual verified is a partial or a false positive match with the individual flagged by our checks. This may be due to a common first or last name, date of birth, citizenship, residency etc. The reason for the false-positive match will be logged within the PEP Match notes. Please refer to our help centre article on possible PEP Matches for further information [here](#).

**If a possible or positive match is identified, we will flag this to your compliance team for escalation.** No further work (e.g. follow-ups) will be conducted until the compliance team instructs First AML to proceed with the next steps.

## 1.7 Simplified due diligence

In certain lower-risk situations, simplified CDD may be applied. First AML may conduct simplified CDD if the customer is not based in a high-risk jurisdiction:

- a public administrator or a publicly owned enterprise;
- an individual resident in a geographic area of lower risk (as decided by the relevant person);
- a credit or financial institution which is subject to requirements in national legislation;
- implementing the 5th Directive and supervised for compliance with those requirements in accordance with the 5th Directive e.g. regulated professional service;
- a company listed on a regulated market (including majority-owned subsidiaries) and the location of the regulated market;

Please refer to this [link](#) for HM Treasury's list of high-risk jurisdictions. Please note this should not be a blanket application, and that the relevant person should still consider conducting simplified CDD on a case-by-case basis.

First AML will also conduct simplified CDD when instructed to do so by the relevant person.

Relevant persons should instruct the level of CDD required for the customer within the 'AML Profile' section. Please refer to our help centre article [here](#).

Simplified CDD procedures will be conducted in line with the requirements of the Regulations and Guidance.

## 1.8 Simplified due diligence information collection

For simplified due diligence, we will collect the following information:

- Customer full legal name;
- Customer registration numbers;
- Regulatory status (if applicable);
- Listing status (if applicable);
- Registered office address and if the different, principal place of business; and
- Evidence confirming the customer's regulatory or listing status from an official independent third-party source.

## 1.9 Ongoing Due Diligence

There are two ways for a Reporting Entity to request Ongoing Customer Due Diligence (OCDD) cases. These cases must be a previously verified entity within the Reporting Entity's own First AML database.

1. "Re-verification required" – First AML will re-verify the entity to ensure the documentation is up to date and there have been no changes to the entity structure. These cases will be charged 50% of your complex fee.
2. "No verification required" – The case will immediately move to the 'Ready to Review' section on the Platform and will not be checked by Analysts. There is no charge for this type of case request.

For individual cases, First AML will send out a new Electronic Verification Form (EID&V Form) and will re-verify their details to ensure it is up to date. This will be charged at the standard individual fee.

## 1.10 Recordkeeping

First AML will keep records of all AML information within our First AML platform. We will retain your customer's information:

1. For as long as necessary to achieve the purposes for which it was collected; or
2. In some cases, where we have an ongoing legitimate need to do so (for example, to comply with legal, tax or accounting obligations, or to resolve disputes), for longer than is necessary to achieve the purpose for which it was obtained.

When First AML no longer has an ongoing legitimate need to process your customer's information, we will either delete or anonymise it. If deletion or anonymisation is not immediately possible (for example, because the information has been stored in backup archives), we will securely store the information and isolate it from any further processing until deletion or anonymisation is possible.

For further information, please refer to the [legal section](#) on our website.

Our verification procedures for other forms of legal entities can be found in Chapter 4 (Verification procedures for common entity types).

## 2.0 Electronic Identity Verification (EID&V)

First AML will verify the identity of individuals by verifying their full name, date of birth and residential address electronically.

First AML will verify the name, date of birth and current residential address using two reliable and independent electronic sources. A legitimate and current government photo-card identification (e.g., passport, driving licence (full or provisional), national ID card) will be used to accomplish this.

These documents are verified against appropriate databases, including relevant government databases. Individuals are sent the First AML verification web form and asked to supply images of one of the identity documents requested.

For address verification, individuals are asked to provide their current residential address, which First AML will verify against credit bureaus such as Experian.

First AML EID&V process comprises the following steps:

1. Identification and verification of the individual's name, date of birth and residential address using two sources.
  - a. Source 1: government ID document
  - b. Source 2: verification against 1 credit bureau source
2. Biometric/Optical Character Recognition (OCR) checks to tie the individual in control of those credentials to the verified identity and establish that the verified individual has possession/control of those credentials.
  - a. This involves the use of video to capture liveness and confirm facial recognition checks, by requesting the end-user to supply evidence via voice and physical movement.
  - b. In the event that a video cannot be collected (e.g. customer's device does not support the video feature) First AML will collect a photo of the individual which will be checked using facial recognition and checked for liveness.
3. Anti-tampering and forgery check

#### 4. PEP, sanctions and adverse media screening

First AML requires explicit consent from the customer before conducting any electronic verification, excluding PEP checks. Consent is provided through First AML's web-based verification form. If a client has not completed verification through the form, First AML will go directly to the customer and explicitly ask for their consent.

Consent can also be collected via phone call, text message and email. The activity log and notes in the First AML platform will be updated accordingly if provided over the phone. Please note any relevant screenshots will also be attached e.g. email chain or text message.

*For the full list of data sources, please refer to the [First AML Compliance Programme Addendum](#).*

### 3.0 Manual Verification

In instances where First AML cannot electronically verify an individual's identity, First AML will revert to acquiring certified copies of identification and/or a non-certified copy of a proof of address document.

The documents should be certified by a professional person or an individual 'of good standing'. The certification must be dated within 3 months of the case request date. The documents themselves must be valid and current.

To do this, First AML will obtain a certified copy of either:

- one government-issued document which verifies either name and address **or** name and date of birth and with a photograph of the customer; or
- a government-issued document that verifies the customer's full name and date of birth and another supporting document which verifies their name and their address.

Certified copies will be received via email (scanned copies).

#### 3.1 Approved certifiers

- [Lawyers](#)
- [Chartered Accountants](#)
- [Justice of the Peace/Notary Public](#)
- Sworn Member of the Police
- Registered Medical Doctor
- Registered Teacher
- Minister of Religion
- Any person who has the legal authority to take statutory declarations or the equivalent in the customer's country

#### 3.2 Certification wording

First AML will request to the customer that the certification must have the following information.

'I, [full name of certifier], hereby certify that this is a true and correct copy of the original document which I have sighted, and it represents a true likeness of this individual.'

- Date of certification
- Signature of certifier
- Profession of certifier

- Registration Number if applicable

If the certification wording is not exact but is not materially different it will be accepted. Please refer to our [manual verification guideline](#) for further information.

### 3.3 Customers unable to produce standard documentation

For elderly, vulnerable or disadvantaged customers, First AML will seek to verify these individuals manually.

In most instances, First AML will collect a letter from an appropriate person who knows the individual and can verify the client's identity as well as any relevant supporting document. Some examples of verification procedures are detailed below.

Customers that are elderly and/or mentally incapacitated:

- Letter from the care home manager confirming identity and residence;
- Letter from a General Medical Practitioner;
- Copies of their expired government ID;
- or Post Office PASS Card; or
- Copies of court documents confirming the individual's identity.

Minor (without government ID):

- or Post Office PASS Card; or
- a birth certificate and confirmation of their parent's address or confirmation of address from the register of the school or higher education institution.

Customers with no current permanent address:

- Letter from a householder named on a current council tax bill or a hostel manager, confirming temporary residence; or
- Confirmation via the electoral register.

## 4.0 Verification Procedures for Common Entity Types

### Private limited companies

Please see section 1.2 *Standard Due Diligence Information Collection* for further details.

### Overseas companies

First AML will endeavour to collect copies of all the above documents where possible. For complex structures, First AML may request a copy of a detailed structure chart to ascertain beneficial ownership and control structures.

### Publicly listed entities

We will collect the following information:

- Company full legal name;
- Company number or other registration numbers;
- Stock ticker symbol;
- Registered office address and if different, principal place of business; and
- Evidence confirming the company's publicly listed status. This may include
  - dated pages of the website of the relevant stock exchange showing the listing;

- articles of the listing in a reputable online third party source; or
- information from a reputable electronic verification service provider or online registry.
- If this is a subsidiary, evidence of the parent/subsidiary relationship will be obtained. This may include
  - the subsidiary's last filed annual returns/confirmation;
  - a note in the parent's or subsidiary's last audited accounts or annual report;
  - information from a reputable electronic verification service provider or online registry; or
  - information from the parent company's published reports, for example, from their website.

## Trusts

Regulation 5 define the beneficial owner for a Trust or any similar legal arrangement, as each of

- the settlor;
- the trustees;
- the beneficiaries, or where the individuals benefiting from the Trust have not been determined, the class of persons in whose main interest the Trust is set up, or operates; and
- any individual who has control over the Trust. E.g. protector, appointer, guardian.

First AML will request an uncertified copy of the Trust Deed and any amendment deed(s) to understand the beneficial ownership and control structure for the Trust.

First AML will analyse the Trust Deed and determine all beneficial owner(s) that need to be verified. Identity verification requests will be sent to them.

If the beneficial owner(s) are individuals or body corporates, we will proceed based on the verifications standards of an individual or a body corporate.

If copies of the Trust documents are unable to be provided, we will ask that equivalent documents from the lawyer, accountant, or Trust services firm involved with the transaction to confirm the below Trust details:

- Full name of the Trust;
- Date of creation for the Trust;
- Country of establishment;
- Registered address of the Trust e.g. where is the Trust currently resident/administered
- Nature, purpose and objects of the Trust (e.g. discretionary, testamentary, bare); and
- Full legal name(s) of the following:
  - Settlor;
  - Trustee;
  - Protector;
  - Guardian;
  - Appointor;
  - Beneficiaries.
- Class of the Beneficiaries (if applicable) e.g. future grandchildren of [X].

The above details will also be noted under the entity notes section of the Trust.

## Corporate trustees

First AML will request that the beneficial owner(s) of a corporate trustee company e.g.

professional Trust service provider, law firm, accountant, are verified as per standard CDD requirements.

In the absence of a beneficial owner with 25% or more shareholding whether directly or indirectly or when there are more than four directors, First AML will verify at least two individuals with superior control, voting rights, direct day-to-day supervision etc. These individuals may be a director of the corporate trustee company.

## **Beneficiaries**

First AML will note all beneficiaries and potential beneficiaries named in the Trust Deed and any associated documents in the entity notes section.

Where the individuals benefiting from the Trust have not been determined, the class of the beneficiaries will be noted. These individuals will not be verified.

Where the individuals benefiting from the Trust have been determined e.g. payment will be made to them or if they will exercise their vested rights in the Trust for the transaction, First AML will verify these individuals upon request. This should be noted within the 'Compliance Team Notes' section. First AML will, by default, identify and verify any non-discretionary beneficiaries of a Trust.

## **Partnerships, Limited Partnerships (LP), Limited Liability Partnerships (LLP)**

For partnerships, First AML will obtain the following information:

- Name of the partnership;
- Registration number (if applicable);
- Registered address and the trading address (if applicable);
- Nature of the business; and
- Copy of the partnership agreement/deed or any equivalent documents. This should include
  - A list of all partners with beneficial ownership
    - LP: General Partners & any Limited Partner with >25% ownership
    - LLP: Partners with > 25% ownership
  - A list of each partner's voting rights/stake or ownership percentage

First AML will verify the following beneficial owners:

- any individual ultimately entitled to or who controls, (whether directly or indirectly), more than 25% of the capital or profits of the partnership or more than 25% of the voting rights in the partnership; and
- any individual who otherwise exercises control over the management of the partnership.

For Limited Partnerships and Limited Liability Partnerships, First AML will obtain a copy of the limited partnership agreement or any equivalent document. The identity of the general partner will be verified along with any limited partners holding more than 25% beneficial ownership or controlling interest.

## **5.0 Case Processing Procedures**

### **5.1 Opening cases**

New cases must be requested via the First AML platform. When submitting a new case, the case requester will be asked to provide the name of the customer, customer type (trust, company, etc) and the name and contact details of at least one contact person. This contact person must not be an internal staff member (i.e. Author or Agent) unless it is essential.

Any case received by 4.30 pm GMT will be opened on the same day. Cases received during the weekend or after 4:30 pm GMT will be opened on the next business day.

If a case is requested and any relevant documentation is held, such as Trust Deeds or partnership agreements, please use the documents tab to upload these before submitting them through.

Please do not upload any ID documents into the documents tab, as this will delay the verification process of your clients. Uploading ID documents may not include the essential elements of electronic ID verification. These include photographs of the front and back of the ID document, residential address confirmation, and consent to electronically verify. All of these elements are captured in the form which is sent to your clients.

### **5.2 Urgent cases**

If there are urgent cases, please try to submit the case as soon as possible to give the First AML team a reasonable amount of time to process the case. First AML cannot guarantee that the case will be completed by the deadline.

If the case is urgent, please notify us by noting this in the First AML platform via the Compliance Team Notes with a date the case needs to be completed.

### **5.3 Awaiting information from customers**

First AML will request information from customers being verified and process information as soon as practicable after it is received. Any delay to case processing is generally due to non-cooperation or slow response from a customer being verified.

### **5.4 Keeping track of case progress**

Reporting entities can monitor the progress of cases in the First AML platform. Verification results for individuals who have been verified will be shown, and documents received can be reviewed.

Any pertinent information will be contained in the 'notes' section, otherwise, you can assume that First AML is awaiting information from the customer if the case is still in progress. We will do everything within reason to get the CDD case completed. You should assume that this is happening behind the scenes. Not every detail of every action will be noted as it is designed to be a summary.

Reporting entities will be able to see all contact made by First AML in the 'Activity' tab. The Activity tab within the First AML platform will have all emails, phone calls, and text messages summarised.

*Please refer to the First AML platform before contacting First AML to discuss a case.*

## 5.5 Reminders

First AML will send periodic reminders (every 2-3 business days) to customers who are not cooperating or are slow to respond. Reminders may be in the form of

- Text messages
- Emails
- Phone calls

After each reminder is sent it will be logged in the 'Activity' tab. First AML is not liable for any further reminders or follow-ups to individuals who are non cooperating with the process.

## 5.6 Email templates

First AML uses email templates when contacting customers to obtain information. Your name and relevant case information are inserted into the template, but the template cannot otherwise be modified. Please refer to Appendix A for example email templates.

First AML will cc one person from your organisation on our initial CDD request emails. This may be a generic inbox. If one is not chosen, this will default to the case requester. The purpose of this is to add a layer of familiarity and ensure your clients are comfortable that First AML has been instructed as your CDD provider.

## 5.7 Use of the 'Notes' section

First AML will use the 'Notes' section to record any pertinent information regarding the case. Reminders and information we are waiting on will be detailed under the 'Activity' tab.

If First AML uncovers an anomaly during the case processing, this will be documented in the 'notes' field and should be reviewed before approving the case. Anything of note e.g. positive PEP Check will be reported to the Compliance Team before ready for review.

## 5.8 Dormant cases

If there has been no response or noncooperation from a customer for 14 days then First AML will mark the case as 'Dormant'. You will not be notified, and the case will be invoiced at the end of the month it was marked Dormant.

If a case has been put 'On Hold' for more than 14 days, the case will be moved to 'Dormant.' The charge for the Dormant case will be the per case fee.

### **5.9 Abandoned cases**

To abandon a case, please notify us via the Compliance Team Notes section. If a case is abandoned after a follow-up has been done, there will be an abandoned case fee. The charge for abandoned cases will be the per case fee.

### **5.10 Exceptions**

Any exceptions to our usual verification and identification procedures for individuals or entities can be requested within each case. Compliance Officers, Platform Admins and First AML Analysts/Admins can request exceptions by using the "Add exception" tool within an individual or entity's profile. By doing so, First AML can acknowledge any exceptions that a reporting entity would like to make to its compliance program.

Platform users can choose between Permanent and Temporary exceptions. Permanent exceptions will remain in place for all existing and future client cases. Temporary exceptions can be granted in the temporary absence of materials to complete necessary identification or verification. These temporary exceptions will be labelled "Unresolved" while waiting for further action from the end-user, and "Resolved" once the exception is no longer required.

### **5.11 Case approval process**

First AML will complete the CDD process in accordance with our Standard Operating Procedure (this document) and the Regulations, however that the Regulations do require some interpretation and judgement, which will be applied on a case-by-case basis. For this reason, the ultimate approval of a case will be by you and dependent on your compliance programme, risk assessment, and any other internal controls you may have in place. With this in mind, once a case is completed by First AML, it will be placed in the 'Ready for Review' section of the First AML platform. From this point, the elected Case Approver will receive an email to review the case.

### **5.12 Languages/Documents not in English**

Where documents are in a foreign language, First AML may ask the customer to provide a translated version where possible (unless the First AML team has a sufficient level of understanding of the language).

## Appendix A – Email and Followup Communication Templates

### A. Email to Client Contact for Body Corporate CDD case

Subject: [Client name] – AML Request for [Case Name]

[Client name] has partnered with First AML to conduct Customer Due Diligence / Know Your Customer reviews for [Case Name].

The next step is to collect some additional information from you.

#### Please provide the following

- [Information to provide to First AML]

#### Button: Submit Information

#### Verification made easy

[Check out our helpful guide](#) for troubleshooting tips and answers to your verification FAQs. If you need additional help, please create a support ticket to get in touch.

Thank you,  
First AML

[Client Name] Case Ref: [Case Reference]  
Client ID: FAMLID- [XXXXXXXX]  
First AML Case Ref: [First AML Case Number]

#### Things to note

- This message is sent from an email that does not accept responses, please do not reply.
- We're asking you to do this so Property Brokers can comply with their obligations under relevant anti-money laundering legislation.
- For information about our data handling and security, please see our [Privacy Policy](#).

## **B. EID&V Email: Email to Individuals to complete Electronic Verification**

Subject: [Client name] – ID Verification for [Individual name]

Hello [Name],

[Client name] has partnered with First AML to conduct Customer Due Diligence / Know Your Customer reviews on [Individual Name].

The next step is to verify your identity.

**Button: Verify Karen's ID**

**Verification made easy**

[Check out our helpful guide](#) for troubleshooting tips and answers to your verification FAQs. If you need additional help, please create a support ticket to get in touch.

Thank you,  
First AML

[Client Name] Case Ref: [Case Reference]  
Client ID: FAMLID- [XXXXXXXX]  
First AML Case Ref: [First AML Case Number]

### **Things to note**

- This message is sent from an email that does not accept responses, please do not reply.
- We're asking you to do this so Property Brokers can comply with their obligations under relevant anti-money laundering legislation.
- You can verify your identity using your smartphone or a desktop computer with a webcam. Microphone and camera access for websites must be allowed. Please check your device settings before opening the form.
- Have your passport or Driver Licence ready before opening the form.
- For information about our data handling and security, please see our [Privacy Policy](#).

### **C. EID&V Email: Follow up email to Individuals to complete Electronic Verification**

Subject: [Client name] reminder – we still need to verify your ID

Hello [Name],

We still need to verify your ID. Argyll may not be able to proceed until this is completed.

**Button: Verify Karen's ID**

**Verification made easy**

[Check out our helpful guide](#) for troubleshooting tips and answers to your verification FAQs. If you need additional help, please create a support ticket to get in touch.

Thank you,  
First AML

[Client Name] Case Ref: [Case Reference]  
Client ID: FAMLID- [XXXXXXXXX]  
First AML Case Ref: [First AML Case Number]

#### **Things to note**

- This message is sent from an email that does not accept responses, please do not reply.
- We're asking you to do this so Property Brokers can comply with their obligations under relevant anti-money laundering legislation.
- You can verify your identity using your smartphone or a desktop computer with a webcam. Microphone and camera access for websites must be allowed. Please check your device settings before opening the form.
- Have your passport or Driver Licence ready before opening the form.
- For information about our data handling and security, please see our [Privacy Policy](#).