

Investment KYC

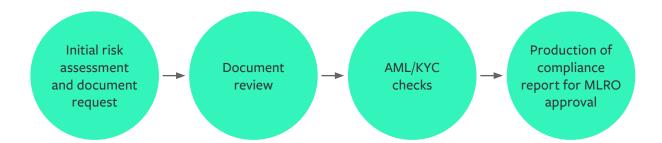
Introduction

Under UK AML regulations and best practice standards set out in the JMSLG, private equity funds should conduct AML Know Your Customer ("KYC") checks on any new unlisted investment or portfolio company acquisition. This is to ensure that the Fund is not inadvertently facilitating money laundering.

This can be challenging because timeframes are often short between a transaction being agreed and executed. But getting it wrong can have serious consequences – finding out down the line that the legal structure of the investment or its owners are not as they seem can create headaches that are best avoided. In the worst case it may create a personal liability for the SMF

17 or MLRO of the authorised Firm under the UK Senior Managers Regime.

IQ-EQ has developed a methodology to quickly perform a risk assessment of the investment and complete all the necessary checks, to give fund managers confidence that their investment KYC risks are understood. We have used the methodology numerous times so you can have confidence that we will deliver as promised. We do this for a fixed price of £1,750 per investment, including providing an industry leading documented risk assessment or compliance report for each transaction to meet best practice standards and record-keeping requirements.



Key considerations / tasks:

- What level of due diligence to apply simplified, standard, enhanced
- Who are the target company shareholders / UBOs
- Documenting risk analysis of all shareholders
- Completion of sanction and PEP screening checks
- AML checks on directors/management team
- Record keeping requirements
- Suspicious activity reports

Incorporating our Investment KYC review into your standard due diligence process for investment decisions will reduce AML risk and give comfort to your investors.

2



About us*

We are IQ-EQ, a leading investor services group employing over 3,600+ people across 24 jurisdictions worldwide, and thus one of the largest independent global providers of trust services. We bring together that rare combination of global expertise with a deep understanding of the needs of our clients. We have the know how and the know you to support fund managers, global companies, family offices and private clients.

Key contacts

To find out about our Investment KYC services please contact one of the team. They would be delighted to speak with you.



Andrew ShrimptonChairman, Compliance
Consulting

E andrew.shrimpton@iqeq.com T +44 207 397 5469

M +44 7850 727 728



Jack Standen
Director, Funds

E jack.standen@iqeq.com

T +44 207 397 5489

M +44 739 287 9148



Rachel Aldridge
Managing Director, Regulatory
& Compliance Solutions

E rachel.aldridge@iqeq.com

T +44 207 397 5450

M +44 796 942 0840



Michael Strug
Director Compliance Consulting

E michael.strug@iqeq.com

T +44 203 991 6624

M +44 747 190 4151

*Information correct as of 17 May 2021

This document is provided for information purposes only and does not constitute legal, tax, investment, regulatory, accounting or other professional advice. For more information on the legal and regulatory status of IQ-EQ companies please visit www.iqeq.com/legal-and-compliance

IQ EQ RegCom (UK) Limited is a compliance services firm registered in England and Wales No 07277134. Sapia Partners LLP is a limited liability partnership registered in England and Wales No OC354934 authorised and regulated by the Financial Conduct Authority, FCA FRN 550103. G10 Capital Limited is a limited company registered in England and Wales No 09224491 authorised and regulated by the Financial Conduct Authority, FCA FRN 648953.

Find out more www.iqeq.com

