

DOMINION



CUSTOMER DUE DILIGENCE (CDD)

Version 5.04 – September 2024





SOF/SOW evidence <u>is not</u> required		SOF/SOW evidence <u>is</u> required
Medium Risk	Higher Risk	High Risk

All clients must provide POI, POA, accept illustrations and Terms & Conditions.
See next page to determine if SOW/SOF evidence is required subject to higher/high risk indicators.

These guidelines provide details on CDD requirements in compliance with the GFSC Handbook on Countering Financial Crime (AML/CFT/CPF).

Our Compliance Department reserves the right to accept, reject or classify any client as High Risk.

Clients classified as High Risk will always require supporting SOW / SOF evidence.

These guidelines may change at any time as per new updates to the GFSC Handbook, international guidelines and new directives.

Legal entities applying for an account must also complete the FATCA & CRS Self-Certification Form.

This document and all the CDD forms required can be found in our Help Centre at help.dominion-cs.com

If you have any questions regarding a specific application, please contact our Compliance or Operations Departments and they will be happy to assist you.

HIGHER / HIGH RISK FACTORS



Higher Risk Countries		High Risk Countries	
Nationality, Residence, Place of Birth, SOW/SOF domicile, Tax Residence			
These countries do not require SOW/SOF evidence, but it may be required if multiple higher RF are present.		SOW/SOF evidence <u>is always</u> required	
Argentina	Nepal	Algeria	Ivory Coast
Barbados	North Sinai	Angola	Kenya
Benin	Panama	Azerbaijan	Lao PDR1
Bolivia *	Peru *	Bangladesh	Madagascar
Chile	Saint Martin	Bosnia and Herzegovina	Mali
Costa Rica	Senegal	Bulgaria	Mauritania
Curaçao	Sierra Leone	Burkina Faso	Mozambique
Dominican Republic	South Africa	Burundi	Nicaragua
East Timor	The Lake Chad Region	Cambodia	Niger
Ecuador *	The Southern Philippines	Cameroon	Nigeria
El Salvador *	The Sulu/ Sulawesi Seas	Chad	Pakistan
Gambia	The Trans- Sahara	China	Papua New Guinea
Guyana	Timor-Leste (East Timor)	Colombia	Paraguay
India	Togo	Comoros	Philippines
Jamaica	Trinidad & Tobago	Cote d'Ivoire (Ivory Coast)	South Sudan
Kazakhstan	Turkey	Croatia	Sri Lanka
Kyrgyz Republic (Kyrgyzstan)	Uzbekistan	Djibouti	Sudan
Lesotho	West Bank and Gaza	Egypt	Tajikistan
Macau	Zambia	Ethiopia	Tanzania
Malawi		Gabon	Venezuela
Mexico *		Guatemala	Vietnam
Monaco		Guinea	Yemen
Namibia		Guinea Bissau	Zimbabwe
		Honduras	

* Countries that may be mitigated to higher risk at DCSL discretion and SOW/SOF may still be required.

High Risk Industries
Applies for all countries
SOW/SOF evidence <u>is always</u> required if the employment or generation of SOW/SOF involves these industries.
<ul style="list-style-type: none"> Charitable sector Construction or other large infrastructure Cryptocurrencies or other decentralised finance Gambling Military or defence Oil, gas, mining, or similar extraction Pharmaceutical production/distribution and Healthcare Executives (e.g.: Owners, Directors) Public procurement (e.g.: government contracts) Private banking

High Risk Amounts
Applies for all countries and industries
SOW/SOF evidence <u>is always</u> required
<ul style="list-style-type: none"> Regular contributions higher than USD 3,000 / month Single contributions higher than USD 350,000

RESTRICTED COUNTRIES



Restricted Countries		
Country	Residency / Point of Sale	Nationality, Place of Birth, SOW/SOF, Tax Residence
Afghanistan	Not Accepted	Not Accepted
Australia	Not Accepted	Accepted
Belarus	Not Accepted	Not Accepted
Canada	Only Foreign Residents	Not Accepted
Central African Republic	Not Accepted	Not Accepted
Congo (DRC)	Not Accepted	Not Accepted
Congo Republic	Not Accepted	Not Accepted
Cuba	Not Accepted	Not Accepted
Equatorial Guinea	Not Accepted	Not Accepted
Eritrea	Not Accepted	Not Accepted
Eswatini (Swaziland)	Not Accepted	Not Accepted
EU – European Union Countries	Reverse Solicitation Required	Accepted
Haiti	Not Accepted	Not Accepted
Hong Kong	Not Accepted	Accepted
Iran	Not Accepted	Not Accepted
Iraq	Not Accepted	Not Accepted
Korea (DPRK)	Not Accepted	Not Accepted
Lebanon	Not Accepted	Not Accepted
Liberia	Not Accepted	Not Accepted
Libya	Not Accepted	Not Accepted
Myanmar (Burma)	Not Accepted	Not Accepted
New Zealand	Not Accepted	Accepted
Russia (Inc. Crimea and Sevastopol)	Not Accepted	Not Accepted
Singapore	Not Accepted	Accepted
Somalia	Not Accepted	Not Accepted
Sudan (North)	Not Accepted	Not Accepted
Syria	Not Accepted	Not Accepted
Turkmenistan	Not Accepted	Not Accepted
Uganda	Not Accepted	Not Accepted
Ukraine	Not Accepted	Not Accepted
United States	Not Accepted	Not Accepted



PROOF OF IDENTITY (POI)

- Must be valid and less than 10 years old.
- Must include full name (including any middle names), ID number, date and place of birth, a clear photo and nationality.

PROOF OF ADDRESS (POA)

- Must be less than 3 months old.
- Acceptable POAs include bank / card statements, water, gas, electricity, landline phone, internet and cable TV invoices.
- It can also be a shared expenses invoice as long as the clients name and address is stated.
- Cellular / mobile phone invoices are not accepted.

SPECIAL CIRCUMSTANCES

- Some countries have specific document types approved in addition to the above. Please check with Operations.
- Where an individual has a second nationality in a high-risk jurisdiction (see previous pages), proof of that nationality will be required through a POI on the same terms as above.
- If for any reason, there is no proof of address under the client's name (i.e., lives with parents/husband/wife, residence is provided by employer and invoices are not under the client's name), it is possible to present a signed Address Description Form (ADF) (additional documents may be required on a case by cases basis). The ADF is found under the "Forms" section in our Help Centre.

ACCEPTED SOW/SOF EVIDENCE



Accepted evidence to support SOW / SOF (if required)

Income From Employment	Letter from Employer confirming income, occupation, name and address of the business
	Copy of pay slip
	Employer confirmation of annual salary
	Bank account statement showing receipt of salary (Statement must show the name of the employer given on the application)
	Latest tax declaration if self-employed
Property Sale	Contract of sale
	Title deed from land registry
Sale of Shares or Investments	Contract
	Evidence of Shares or investments sold and the value
	Statement of account from agent
	Transaction confirmation/receipt
Inheritance	Will with the details of the estate inherited
	Grant of probate
Company Sale	Contract of sale confirming the name and address of the company, the total sale price and nature of business
	Documentation stating the date of sale and receipt of funds
Company Profits / Dividends	Latest audited financial statements
	Latest Management accounts
	Document evidencing the Board of Directors approval to pay the dividend
	Latest Dividend distribution
Divorce Settlement	Latest Tax declaration Form
	Letter from solicitor
Savings	Bank Statement
Lottery / Gambling Win / Gift	Legal document evidencing
	Written consent confirming if gift from the benefactor
Other	Please provide evidence of the information declared above



PERIODIC REVIEWS

- Background checks on all Dominion clients will be run on a daily basis and all accounts will be reviewed on a periodic basis.
- Medium Risk clients will be reviewed every 2 years.
- High Risk clients will be reviewed every year.
- Risk ratings may change on any periodic review and additional / updated CDD documents may be required.

TRIGGER EVENTS

- Accounts with outstanding CDD documents will be required to remediate their CDD status on trigger events.
- Trigger events include but are not limited to POI expirations, periodic review dates, additional contributions, redemptions.
- Changing any personal details (address, name, employment, etc.) may also constitute a trigger event where new documentation will be required.
- Redemptions will not be paid out until such remediation is completed.
- Additional contributions using a different SOF than other contributions will require evidence for each SOF (where the risk rating requires).

CDD DOCUMENTS

- POA document must be less than 3 months old at the time it is uploaded.
- Our platform will let you know when a new file update is required for your clients.
- Upon notification you will be asked to upload to our platform an updated version of the document on file.



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