

Identity Checklist

Before we can act for you, the firm Keogan Law & Tax, needs to be sure of your identity and where you have got your assets from.

Ireland has an extensive anti-financial crime regime in place. Specific anti-money laundering laws require professional persons and other bodies which might likely be able to identify instances of money laundering/terrorist financing to perform customer due diligence, implement anti-money laundering and counter financing terrorism policies and procedures and report suspicions to the authorities. Solicitors and tax consultants are designated persons under this legislation.

Therefore, in order to identify and verify you as a client and before you can become our client, even if we might know you, you should provide the following information to us to verify your identity and your permanent address.

Individuals

- a scan/copy of your passport or driver's licence
- a scan/copy of a recent (within the last 3 months) utility bill setting out your usual permanent address.

Trusts

- verified identity of all settlors
- verified identity of all trustees
- verified identity of all protectors
- verified identity of all persons who holds a power of appointment over a trust fund
- verified identity of all identifiable beneficiaries including ultimate beneficial owner
- certified copy of the relevant trust documentation, e.g. trust deed, variations of trust deed, appointment of trustees, retirement of trustees, appointment of funds to a beneficiary.

We also require understanding of the ownership and control structure of the entity or arrangement concerned to ensure correct identification of everyone concerned. In particular in the case of beneficial owners of a trust we will require identity verification for

- any individual who is entitled to a vested interest in possession, remainder or reversion whether or not that interest is defeasible in at least 25% of the capital of the trust property
- any individual who has control over the trust
- the class of individuals in whose main interest the trust is set up or operates.

Companies

- verified identity of each shareholder including ultimate beneficial owner(s)
- verified identity of each director
- certified copies of the certificate of incorporation and any change of name
- certified copies of the latest constitutional documents (memorandum and articles of association) of the company.

We suggest you send us a scan of these documents first to us so that we can hold them in soft copy and start any necessary checks. You should bring the originals of these documents to our meeting for final verification. If we are not to meet shortly, you should provide us with certified copies of these documents by regular post also.

Professional firms

Where we act on a consultancy basis for you as another professional firm we shall rely on the fact that we assume

- you are a designated body under EU/national legislation to carry out identity checks;
- that you have in fact carried out the necessary anti-money laundering checks on your clients in each case;
- that you will continue to monitor your clients for this purpose;
- that you will notify us immediately should you cease to have a business relationship with the relevant client; and
- that you will advise us if such cessation arises out of concerns and/or suspicions with regard to money laundering and/or terrorist financing.

The anti-money laundering legislation requires us to apply enhanced measures to Politically Exposed Persons ('PEPs') who are resident outside Ireland. If you have, or have had, a high political profile, or hold, or have held, public office or are a known close associate or are closely related to such a person, you should please advise us as further checks and procedures must then be undertaken prior to us establishing a business relationship with you (and the client firm should advise us if the client of that firm is a PEP). We may form the opinion independently of you that you are a PEP and we reserve the right to require further identification and information for this purpose.

We may from time to time request further information from you such as up to date information and information to understand your circumstances and business, the source of wealth involved in any transaction, the purpose of specific activities and the expected nature and level of activities.

In all cases these details will be retained in accordance with our Privacy Policy.

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