

DUE DILLIGENCE AND CERTIFICATION GUIDANCE DOCUMENT FOR TRUSTS

Due Diligence Requirements and Certification

The due diligence requirements listed below are correct at the time of publication of the Application Form and other related forms as referred to under Section 5 of the Application Form. Rules, regulations, and laws (under which the Company operate) could change at any time. As such, the Administrator reserves the right to request additional due diligence as and when required to ensure compliance with current regulation.

All applicants must provide due diligence documents as detailed in this guidance document.

The documentation required will vary depending on the type of applicant and whether you reside in an Appendix C country or territory as defined in the Handbook on Countering Financial Crime(AML/CFT/CPF), issued by the Guernsey Financial Services Commission (**the Handbook**). As of October 2025, the Handbook was last updated on 4 September 2025 and the link to the GFSC website as of October 2024 [Handbook on Countering Financial Crime \(AML/CFT/CPF\)](#).

Appendix C jurisdictions can be found in the Handbook Appendix C.

Please refer to relevant section/s below to ensure the following due diligence documentation accompanies the Application Form.

Countries and territories that the GFSC have identified as presenting a higher risk of ML, TF and/or PF can be found in the Handbook Appendix I.

1. Due diligence for each Natural Person connected to the Trust

1.1 Proof of identity for each applicant:

Original certified copy of one of the following documents, each document must have a clear legible photograph and if dual nationality is held, please provide verification for each nationality;

- Valid passport
- National identity card (preferred)
- Armed force’s identity card
- Driving licence (this cannot be used for both identity and address, a separate verification must be provided for each)

1.2 Proof of residential address for each applicant:

Original certified copy of one of the following documents, each document must be dated within three (3) months and all documents must be for a residential address, we do not accept C/O addresses, PO Box addresses or mobile telephone bills.

- Utility bill (water, electricity, gas, internet, home telephone)
- Bank statement
- Bank debit/credit card statement
- Council Tax invoice (or other correspondence from a government department or agency)
- Driving license (this cannot be used for both identity and address, a separate verification must be provided for each)
- Electronic statements (for utility bills, bank credit cards, etc.) are deemed to be originals.
- Co habitation letter (If proof of address is provided by way of a letter of co-habitation from a person who is not party to the investment, due diligence documentation on that party will also be required).

Where the applicant(s) is a party to the investment and is in a High Risk country, proof of address for each applicant must be provided.

1.3 Source of Funds documentary evidence for each applicant:

Each applicant must disclose, in the Source of Funds (“SoF”) / Source of Wealth (“SoW”) Declaration form these details.

For each applicant deemed to be a high risk individual, we will require documentary evidence. Please refer to Appendix one in the attached SoF/SoW Declaration form.

Examples are below:

SoW = Savings from employment – we need three months current wage slips from your employment

SoF for savings - Bank Statements for a three month consecutive period confirming employment wages.

If you are unsure about what documentation to provide please contact the Administrator to discuss further.

Important:

- Should any other party retain signing authority over the investment (e.g. Financial Adviser/Distributor) then due diligence documentation in respect of such other party will also be required by the Company and an original certified copy of such agreement between the parties.
- All applications from non-Appendix C Jurisdictions will be considered on a case-by-case basis and additional due diligence documentation may be requested.
- The Administrator reserves the right to request additional documentation as and when required. If an applicant is unable to supply any of the documentation described, they should contact the Administrator to discuss mutually acceptable alternative arrangements.

2. CERTIFICATION

2.1 A certifier cannot be closely related to the person whose identity is being certified; and the certifier cannot certify their own documents.

2.2 Original certified documents without a photo must be certified as follows:

I hereby certify this as a true copy of the original document, which I have seen.

2.3 Original certified documents with a photo must be certified as follows:

I hereby certify this to be a true copy of the original document, which I have seen, and the photograph bears a true likeness of the person named therein, who I have met.

2.4 Certifier Information required on the document

- Full name and signature
- Date of certification
- Job title/position
- Capacity in which they are signing
- Name of regulatory body (if applicable i.e. ACCA, FSA, Law Society)
- Registration number issued by a regulatory body (if applicable)
- Contact information (telephone number and/or email address)

2.5 The following persons can be considered suitable to certify due diligence documentation of natural persons:

- a member of the judiciary, a senior civil servant, or a serving police or customs officer (stamp to include member’s name, title and contact telephone number);
- an officer of an embassy, consulate or high commission of the country or territory of issue of documentary evidence of identity;

- a lawyer who is a member of a recognised professional body;
- a notary public who is a member of a recognised professional body;
- an accountant who is a member of a recognised professional body;
- an actuary who is a member of a recognised professional body;
- a member of the Institute of Chartered Secretaries and Administrators; or
- a director or officer of an Appendix C Jurisdiction Regulated Financial Services Business (see the definition in Appendix C to the Handbook) or of a Financial Services Business subject to group/parent policy where the Head Office is situated and regulated in a country or territory listed in Appendix C to the Handbook.

3. Application Form Checklist – Entity Due Diligence Requirements

The due diligence requirements listed below are correct at the time of publication of this document. However, the rules, regulations, and laws under which the Trust operate could change at any time. As such, the Administrator reserves the right to request additional due diligence as and when required to ensure compliance with current regulations.

Applicants must provide the due diligence listed below, please ensure that you have satisfied these application requirements by ticking the relevant boxes.

All documents must be received in original or original certified wet ink documents.

Please note that the below due diligence list is not exhaustive, and the Administrator could request additional due diligence in order to satisfy their regulatory and legal obligation.

A. Corporate Trustee regulated by the Guernsey Financial Services Commission	
A completed application form.	
A completed Entity Tax Self-Certification Form.	
Registry print.	
Evidence of regulation.	
Authorised Signatory List.	

B. Individuals as Trustee	
A completed application form.	
For the Trust: An original certified copy of the Trust deed (or extract) confirming the date, place and establishment of the Trust, the Trustees, the economic settlor, the protector and the beneficiaries (including deeds of retirement and appointment of the Trust parties if applicable).	
For the Trust: A completed Individual and/or Entity Tax Self-Certification Form.	
For the Trust: for each individual Trustee, economic settlor, protector and for all parties that have benefitted; A completed Individual and/or Entity Tax Self-Certification Form.	

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<p>For the Trust: for each individual Trustee, economic settlor, protector and for all parties that have benefitted;</p> <p>A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
<p>For the Trust: for each individual Trustee, economic settlor, protector and for all parties that have benefitted;</p> <p>Verification of identity: a certified copy of a valid national ID card or passport of each individual Trustee, economic settlor, protector and all parties that have benefitted with clear photograph. If dual nationality is held, please provide verification of identity for each nationality.</p>	
<p>For the Trust: for each individual Trustee, economic settlor, protector and for all parties that have benefitted;</p> <p>For each Natural Person - Refer to guidance as set out herein for Proof of Address and Proof of Identity.</p>	
<p>For the Trust: For all parties that are likely to benefit and any other named beneficiary;</p> <p>A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
<p>Note:</p> <p>If no parties have benefitted, the Trust is a discretionary Trust and the AML regulations in your jurisdiction do not require that you obtain client due diligence on beneficiaries until they receive benefit, then we will require an original signed letter from the Trustee confirming these points.</p>	

C. Appendix C regulated Corporate Trustee domiciled outside of Guernsey	
A completed application form.	
<p>For the Trust:</p> <p>An original certified copy of the Trust deed (or extract) confirming the date, place and establishment of the Trust, the Trustees, the economic settlor, the protector and the beneficiaries (including deeds of retirement and appointment of the Trust parties if applicable).</p>	
<p>For the Trust:</p> <p>A completed Entity Tax Self-Certification Form.</p>	
<p>For the Trust: for each economic settlor, protector and for all parties that have benefitted:</p> <p>For each Natural Person - Refer to guidance as set out herien for Proof of Address and Proof of Identity.</p>	
<p>For the Trust: for each economic settlor, protector and for all parties that have benefitted:</p> <p>A completed Individual and/or Entity Tax Self-Certification Form.</p>	
<p>For the Trust: for each economic settlor, protector and for all parties that have benefitted:</p> <p>A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
<p>For the Trust: for all parties that are likely to benefit and any other named beneficiary:</p> <p>A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
Note:	

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<p>If no parties have benefitted, the Trust is a discretionary Trust and the AML regulations in your jurisdiction do not require that you obtain client due diligence on beneficiaries until they receive benefit, then we will require an original signed letter from the Trustee confirming these points.</p> <p><u>If any of the individual parties to the Trust are high risk such as a PEP we will require their full due diligence even if they have not benefitted or are not likely to benefit.</u></p>	
<p>For the Corporate Trustee: Evidence of regulatory licence.</p>	
<p>For the Corporate Trustee: An original or certified copy of authorised signatory list including specimen signatures.</p>	
<p>For the Corporate Trustee: for each director and individual beneficiary with a 25% or greater holding of the Corporate Trustee: A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
<p>For the Corporate Trustee: for each director and individual beneficiary with a 25% or greater holding of the Corporate Trustee: A completed Individual and/or Entity Tax Self-Certification Form.</p>	

D. Unregulated Corporate Trustee	
A completed application form.	
<p>For the Trust: An original certified copy of the Trust deed (or extract) confirming the date, place and establishment of the Trust, the Trustees, the economic settlor, the protector and the beneficiaries (including deeds of retirement and appointment of the Trust parties if applicable).</p>	
<p>For the Trust: A completed Entity Tax Self-Certification Form.</p>	
<p>For the Trust: for each economic settlor, protector and for all parties that have benefitted: For each Natural Person - Refer to guidance as set out herein for Proof of Address and Proof of Identity.</p>	
<p>For the Trust: for each economic settlor, protector and for all parties that have benefitted: A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
<p>For the Trust: for each economic settlor, protector and for all parties that have benefitted: A completed Individual and/or Entity Tax Self-Certification Form.</p>	
<p>For the Trust: for each economic settlor, protector and for all parties that have benefitted; A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
<p>For the Trust: for all parties that are likely to benefit and any other named beneficiary;</p>	

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A completed Related Parties and Controlled Persons Identification Form for each individual.	
<p>Note: If no parties have benefitted, the Trust is a discretionary Trust and the AML regulations in your jurisdiction do not require that you obtain client due diligence on beneficiaries until they receive benefit, then we will require an original signed letter from the Trustee confirming these points.</p> <p><u>If any of the individual parties to the Trust are high risk such as a PEP the Administrator will require the full due diligence even if they have not benefitted or are not likely to benefit.</u></p>	
<p>For the Corporate Trustee: An original certified certificate of incorporation/registration (and any name changes).</p>	
<p>For the Corporate Trustee: An original certified directors register for the Corporate Trustee.</p>	
<p>For the Corporate Trustee: An original certified share register for Corporate Trustee.</p>	
<p>For the Corporate Trustee: An original or certified copy of authorised signatory list including specimen signatures.</p>	
<p>For the Corporate Trustee: for each director, authorised signatory and individual beneficiary with a 25% or greater holding of the Corporate Trustee; A completed Related Parties and Controlled Persons Identification Form for each individual.</p>	
<p>For the Corporate Trustee: for each director, authorised signatory and individual beneficiary with a 25% or greater holding of the Corporate Trustee; A completed Individual and/or Entity Tax Self-Certification Form.</p>	
<p>For the Corporate Trustee: for each director, authorised signatory and individual beneficiary with a 25% or greater holding of the Corporate Trustee; For each Natural Person - Refer to guidance as set out herein for Proof of Address and Proof of Identity.</p>	
<p>Note: If the beneficiary of the Trust is a Corporate entity or another Trust we will also require full due diligence on that Corporate entity or Trust.</p>	

E. Corporate Trustees domiciled in a high risk jurisdiction (either regulated or unregulated)	
A completed application form.	
<p>For the Trust: An original certified copy of the Trust deed (or extract) confirming the date, place and establishment of the Trust, the Trustees, the economic settlor, the protector and the beneficiaries (including deeds of retirement and appointment of the Trust parties if applicable).</p>	
<p>For the Trust: Latest available audited year-end financial statements.</p>	

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<p>For the Trust: A completed Individual and/or Entity Tax Self-Certification Form.</p>	
<p>For the Trust: for each economic settlor, protector and for all beneficial parties: For each Natural Person - Refer to guidance as set out herein for Proof of Address and Proof of Identity.</p>	
<p>For the Trust: for each economic settlor: Completed Source of Wealth Fund declaration with documentary evidence.</p>	
<p>For the Trust:- for each economic settlor, protector and for all beneficial parties; A completed Individual and/or Entity Tax Self-Certification Form.</p>	
<p>For the Trust:- for each economic settlor, protector and for all beneficial parties; A completed Related Parties and Controlling Persons Identification Form for each individual.</p>	
<p>Note: <u>If any of the individual parties to the Trust are high risk such as a PEP we will require their full due diligence even if they have not benefitted or are not likely to benefit.</u></p>	
<p>For the corporate Trustee; An original certified certificate of incorporation/registration (and any name changes).</p>	
<p>For the corporate Trustee; An original certified directors register for the corporate Trustee.</p>	
<p>For the corporate Trustee; An original certified share register for corporate Trustee.</p>	
<p>For the corporate Trustee; An original or certified copy of authorised signatory list including specimen signatures.</p>	
<p>For the corporate Trustee: for each director, authorised signatory and individual beneficiary with a 10% or greater holding of the corporate Trustee; A completed Related Parties and Controlled Persons Identification Form for each individual.</p>	
<p>For the corporate Trustee: for each director, authorised signatory and individual beneficiary with a 10% or greater holding of the corporate Trustee; A completed Individual and/or Entity Tax Self-Certification Form.</p>	
<p>For the corporate Trustee: for each director, authorised signatory and individual beneficiary with a 10% or greater holding of the corporate Trustee; For each Natural Person - Refer to guidance as set out herein for Proof of Address and Proof of Identity.</p>	
<p>Note: Please note that if the beneficiary is a Trust or corporate entity then we will also require full due diligence on the Trust or corporate entity, if you are unsure what you need to provide please contact the Administrator to discuss.</p>	