**ANTI-MONEY LAUNDERING (AML) & COUNTERTERRORISM FINANCING (CTF)**

Black Diamond Private Wealth LTD (BDPW) by law must take AML and CTF extremely seriously. Refer to [www.bdpw.io](http://www.bdpw.io) for our policies for AML and CTF. It is a legal requirement that ***all Lenders*** provide the identification to BDPW as outlined below. All client documentation is held on BDPW secure servers for a period of 6 years following the maturity of any loan as governed by the ANTI-MONEY LAUNDERING & COUNTERTERRORISM FINANCING ACT NO. 13 OF 2014, VANUATU.

|  |  |
| --- | --- |
| Understanding AML and CTF: |  |

Introduction The AML&CTF Act imposes requirements on reporting entities related to reporting of transactions, record keeping, staff awareness and implementing customer due diligence processes. These statutory requirements are briefly outlined in this Part of the Guideline. In addition, to assist reporting entities develop internal policies, processes and procedures to establish an effective system to combat money laundering and terrorist financing, this Part provides guidance on the practical implementation of the requirements and intent of the AML&CTF ACT and AML&CTF Regulations.

|  |  |
| --- | --- |
| Anti-money laundering (AML) |  |

Anti-money laundering (AML) refers to a wide set of laws and regulations mandating steps that financial institutions and other regulated industries must take to prevent criminals from depositing or transferring funds that come from illicit activity – money laundering. AML regulations are designed to stop the financing of terrorism and other illicit activities. Regulated industries must not knowingly or unknowingly aid these activities.

|  |  |
| --- | --- |
| Counterterrorism Financing (CTF) |  |

Terrorist financing involves collecting and providing funds for terrorist activity. Terrorist activity has as its main objective, intimidation of a population or compelling a government to do something or not do something. This is done by intentionally killing, seriously harming or endangering a person, causing substantial property damage likely to seriously harm people or by seriously interfering with or disrupting essential services, facilities or systems.

|  |  |
| --- | --- |
| Know your customer (KYC) |  |

Know your customer (KYC) refers to the KYC checks that a company carries out to ensure their customers are who they say they are and do not pose a risk to the business.

While these terms are often used interchangeably, anti-money laundering (AML) is the collective term for a range of regulatory compliance processes businesses must have in place of which KYC compliance is one. KYC checks typically fall into three activities.

* Customer due diligence (CDD)
* Enhanced due diligence (EDD)
* Continuous Monitoring

|  |
| --- |
| BDPW requires each Lender to provide the following documents under the Law of Vanuatu. These documents are to be held on BDPW secure servers internally for 6 years following the maturity of the loan. Documents may be required to be updated during the loan period of the loan term. |

|  |
| --- |
| CORPORATE LENDERS MUST PROVIDE EITHER:  (Corporation, SMSF, Business Name, Business Partnership) |
| * Director(s)/shareholder(s) Passport * Director(s)/shareholder(s) Drivers License or photo ID from local Government * Proof of Corporation, SMSF, Business Name, Business Partnership – Full set corporate documents. |

ANTI-MONEY LAUNDERING (AML) & COUNTERTERRORISM FINANCING (CTF)

**CORPORATE/SMSF/BUSINESS/ PARTENRSHIP - INFORMATION RECORD**

**Legal /Corporate Persons**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Legal Name:** | |  | | | |
| **Company Number:** | |  | | | |
| **Director/s Name/s:** | |  | | | |
| **Registered Address:** | |  | | | |
| **Email:** | |  | | | |
| **I give consent for my Financial Planner, Financial Advisor and/or Accountant to provide Black Diamond Private Wealth Ltd with a list of my corporate documents:** | | | Yes | No |
|  | Copy of the SMSF Trust Deed | | | |
|  | Copy of the Company Deed of the Trustee Company | | | |

|  |  |
| --- | --- |
| **Documents Attached:** | |
|  | Copy of all director/s and shareholder/s Driver’s License & Passports |

I give my consent under the law of Vanuatu, for Black Diamond Private Wealth LTD to hold my corporate information securely for a period of 6 years following the maturity of my loan term.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Full Name: |  |  | Signature: |  |