



Covid-19 - Changes to Verifying Client Due Diligence

As we find ourselves in another 'lockdown' situation due to Covid-19, we must adapt our methods of verifying client due diligence ('CDD'). Due to Government restrictions, we are no longer able to meet with clients face to face in order to view and verify their documents. In light of this, during the lockdown period, we will be accepting CDD as follows in line with FSA guidance:

Proof of Identity and Proof of Address

1. A clear scan or photograph of the both the photo ID and proof of address document (e.g. utility bill).
2. In order to verify this, we will require:
 - a 'selfie' of the client holding each document in turn, ensuring that the detail is clearly visible; or
 - a video call with the client where the documentation is shown and verified on screen during the call.

For ongoing business, this is only a temporary solution and full CDD should be produced as soon as possible once Government restrictions are lifted.

Please visit <https://www.iomfsa.im/media/2677/covid-19-amlcft-faqs.pdf> to view the full FSA guidance.