

Morningstar Wealth International Limited

Client Due Diligence (CDD) Guidelines

Valid from 20 July 2026



The requirements for CDD

Morningstar Wealth International Limited (WIL) is regulated by the Jersey Financial Services Commission (JFSC) and required to comply with the Money Laundering (Jersey) Order 2008 and the JFSC AML/CFT/CPF Handbook. All onboarding requirements are driven by statutory obligations rather than commercial preference.

This document is designed as a practical guide to assist your firm in obtaining the necessary CDD information and/or documentation from clients to support their application and the ongoing relationship we will have with them.

Key Onboarding Principles

- Appropriate CDD is mandatory for all clients before an account can be opened or funded;
- A risk based approach - higher risk relationships will require additional information and evidence;
- Accurate, complete and properly certified documents at the outset significantly reduce onboarding times; and
- WIL may request additional information at any stage to meet ongoing regulatory obligations.

For any **GIA or ISA** that is not funded within a 12 month period from approval, the application will be deleted and it will be necessary for a new application form and for refreshed due diligence to be provided as if it was a new account.

What Is Always Required (All Client Types)

At a minimum, all applications must include:

- A fully completed and signed application form;
- Client identification and address verification documents;
- Details of source of funds (SOF) and details of source of wealth (SOW);
- Tax residency information and Tax Identification Numbers (TINs);
- Relevant FATCA/CRS self-certification forms (e.g. W 8 / W 9);
- Correct certification of all documents, including digital certification where permitted.

Requirements for higher risk relationships (enhanced due diligence)

- A second form of identification
- Evidence to support the source of funds and source of wealth
- If nationality or place of birth is a prohibited country/jurisdiction, a biography letter will be required confirming any links to that country/jurisdiction.

Please note that for customers resident in Kenya we will require enhanced due diligence for all clients regardless of risk rating.

The receipt of accurate and correctly certified documentation at the outset will assist us in providing a quicker service and take-on process for clients.

Common reasons for application delays

To assist with the onboarding process, ensuring the correct information and documents are provided is essential. Below are some common reasons for application delays:

The certification wording is incomplete or inaccurate	Ensure you review the certification wording included on page 4
The information included within the application form does not match the due diligence evidence provided	Review the details included within the application form to ensure they match to the identification, proof of address and tax documents provided
The application form has not been signed by the investor / adviser	Before submitting the application, ensure the appropriate signatures are included
Missing supporting due diligence / enhanced due diligence documents	Review the CDD Guidelines to ensure all documents are provided before submitting the application

Due diligence documents provided are not in English	All documents must be in English or translated into English if in a foreign language
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Digital Certification

With effect from 1 June 2026, we will accept digital certification via one of the approved digital signature providers as noted below. For this form of certification to be acceptable, it must include the following, and documents submitted without a complete audit trail cannot be accepted:

- the digital signature must be on the copy of the document itself, it MUST NOT be on a separate page;
- the correct wording must confirm in all instances that it is a true copy of an original document that you have personally had sight of plus a true likeness of the individual for identification documents; and
- The certified document is supported by the full electronic audit trail from the digital signature provider.

If any of this information is not provided, the onboarding process will be delayed.

Digital Signature Providers

The digital signature providers are DocuSign, Adobe Sign, PandaDoc, Signable, SignNow, Sertifi, Dropbox Sign, Galaxkey, Zoho sign, Virtual Cabinet and Advicefront, we will not accept digital certification from other providers.

Note that where the digital signature requirements cannot be met, wet-signed certification would continue to be required. The use of video calls to present documents is not acceptable.

How to use this document

The CDD information required is determined by the type of client, and/or their risk profile which is determined by several factors such as their place of residence or registration, the value of the investment, as well as any other client specific factors such as if the client is a Politically Exposed Person (PEP). For ease of reference, we have separated individual and corporate clients into two tables setting out the CDD requirements for each.

This practical guide is designed in easy-to-follow steps:

CDD documentation steps	
Step 1	Verification of identity and address where; • Client is an Individual; OR • Client is a Legal Entity Verification includes photographic evidence and address verification
Step 2	Certifying documents
Step 3	Verifying Source of Funds and Source of Wealth
Step 4	Clients who are Nationals of Prohibited Countries
Step 5	FATCA and Common Reporting Standards (CRS)
Step 6	Send all required documentation to Morningstar Wealth Platform
Step 7	Trigger event and regular reviews (For existing customers only)
Step 8	Receipt of funds
Appendix One	Evidence of identity and address verification
Appendix Two	Source of funds and source of wealth acceptable documentary evidence
Appendix Three	Country Risk Rating Tables

Step 1 – Due Diligence documents

To verify the identity of a client, we require at a minimum photographic evidence plus evidence of their residential address. The table included within [Appendix One](#) confirms the form(s) of identification and address verification that will be required to support an application based on the residency/nationality of the client(s). It also provides confirmation of what is required for legal entity accounts and trust relationships.

It may be necessary for us to ask for up to date documents to be provided for existing customers at certain points during our relationship with them.

As we will not meet most of our clients face to face, certified copies of any documentation is required.

Individual customers (Sole or joint account)

We will require 1 form of identification such as a passport or driving licence, and for any high risk customers, two forms of identification.

For Legal entities

We need to understand the structure of the company or partnership and identify the persons who are considered to have a legal and beneficial ownership and/or control over the legal entity.

For Trusts

We need to identify the settlor, protector and anyone who has settled capital into the Trust or has a beneficial interest or is the object of power over the Trust.

Corporate and Individual trustees

We need to identify all the trustees acting on behalf of the trust.

The full details of what is acceptable for all client types is contained within [Appendix One](#).

PHOTOGRAPHIC EVIDENCE

We will accept a certified copy of the following:

- A current Passport;
- A current National Identity card;
- A current Driving licence, where the licensing authority carries out a check on the holder's identity before issuing.

Please Note: the copy document **MUST** be in COLOUR and high resolution (a minimum of 300 dpi) and all four corners must be visible. Ensure that the image is not obscured or blurred so that the security features are visible.

The required wording for identification documents should read "I hereby certify that this document is a true copy of the original document that I have seen and a true likeness of the individual" and the certification wording should be accompanied by:

- Full name of the person certifying the document;
- The signature of the person certifying the document;
- Date the certification has been completed; **and**
- The full company name and address, plus the telephone number and email address for the person certifying the document.

ADDRESS VERIFICATION

There are different forms of address verification, such as a utility bill or bank statement as noted within the table included within [Appendix One](#).

The required wording for address verification documents should read "I hereby certify that this document is a true copy of the original document that I have seen" and the certification wording should be accompanied by:

- Full name of the person certifying the document;
- The signature of the person certifying the document;
- Date the certification has been completed; **and**
- The full company name and address, plus the telephone number and email address for the person certifying the document.

Locator Address

Where an individual has a valid reason for being unable to produce more usual evidence of their residential address, we can accept the following:

Site Visit and Employer Letter

We can accept written confirmation from an individual satisfying the criteria for a suitable certifier, that he or she has visited the individual at the address or where the accommodation is being provided by an employer. The letter must be on headed paper and include the full address being confirmed as well as the name, address and contact information for the certifier. It should also include the reasons why the usual forms of address verification cannot be provided.

Locator address confirmation

If it is not possible to visit an individual's address to verify location, a "locator address" may be obtained but this is to be used in exceptional circumstances only and only with advanced approval from Morningstar Wealth International Limited. A "locator" address is an address at which it would normally be possible to physically meet or contact an individual (with or without prior arrangement), for example, an individual's place of work. This option should only be used in exceptional circumstances where all other options have been exhausted.

For a locator address confirmation to be acceptable we require a letter from the employer on company headed paper, addressed to Morningstar Wealth Platform and signed by a duly authorised representative detailing:

- The name of the employee;
- Confirming the length of contract with the company (dates to/from);
- Confirming that the employer has the means to locate and contact the individual on demand; and
- Confirmation that the employee is located at their office and would need to include the full office address.

Step 2 – Certifying documents

Suitable Certifiers

A suitable certifier **must** have met the person and had sight of the documents at the time they are being certified. The following individuals are permitted to certify documentation:

- A Director, officer or manager of a regulated financial services business which is operating in a well-regulated country or territory or of a branch or subsidiary of a group headquartered in a well-regulated country or territory which applies group standards to subsidiaries and branches world-wide and tests the application of and compliance with such standards;
- A member of the Judiciary, a senior civil servant or a serving police or customs officer;
- An officer of an embassy, consulate or high commission of the country of issue of the document being used as evidence of Identity;
- An individual who is a member of a professional body that sets and enforces ethical standards (e.g. Notary, Advocate or Accountant);
- An individual that is qualified to conduct certification services under authority of the Certification and International Trade Committee (e.g. Chamber of Commerce).

Please note that a person cannot be a suitable certifier if they are:

- Related to the person being identified by birth or marriage; or
- In a relationship or living with the person being identified.

Step 3 – Source of Funds and Source of Wealth

We have regulatory obligations to understand the Source of Funds and the Source of Wealth for all our clients.

Source of Funds (SOF) – This is the activity which generates the funds associated with this investment (e.g. client's occupation/business activities or transferring a pension or existing investment product). If SOF is from earnings, please detail the job title in the Profession field within the application form. If retired, please state the last employment (e.g. CEO of XYZ Ltd).

Source of Wealth (SOW) – This is distinct from SOF and describes the activities which have generated the total net worth of the client, not just the funds associated with this particular investment. This could be in the form of an inheritance or other business activities. It may be the case that your client's SOF and SOW are the same and this should be noted within the application form.

Evidencing the SOF and SOW

Evidence of SOF and SOW will be required as part of our enhanced due diligence (EDD) requirements if the client is classed as a Politically Exposed Person (PEP), where there are higher risk indicators and for investments over GBP750,000 (or currency equivalent). To assist you in understanding how we categorise risk for different countries, please see the Country Risk Rating tables included in [Appendix Three](#).

Examples of those indicators where a client could be classed as high risk include the following and this list is not exhaustive:

- the client or any beneficial owner/controller is a PEP;
- the client or any beneficial owner/controller is resident in or a national of a higher risk jurisdiction;
- SOF/SOW is from a higher risk industry (see below);
- SOF/SOW is from a higher risk jurisdiction;
- the value of the intended investment is over £750,000 (or currency equivalent);
- the customer presents a higher money laundering or terrorist financing risk; or
- there is a complex ownership structure for corporate and trust relationships.

Enhanced Due Diligence applies where one or more higher-risk factors are identified and is not limited to monetary thresholds alone.

The higher risk industries are as follows and would be relevant whether the customer is directly or indirectly involved:

- Arms/Weapons/Ammunition - manufacture, purchase, sale, supply, delivery, import/export
- Cryptocurrency, Initial Coin Offering and Tokenisation of Real-World Assets
- Dual use goods - Involvement, directly or indirectly, in the exportation or importation of goods or technology that would be considered as dual use goods, e.g. navigation & avionics, propulsion systems, chemicals etc.
- Mining, drilling or quarrying for natural resources - direct or indirect involvement
- Security or protection services provided to governments, military or individual clients
- Pharmaceutical - manufacture, marketing or sale of pharmaceutical goods or devices

Documentary Evidence

The table included as [Appendix Two](#) provides examples of what is acceptable as evidence of SOF/SOW.

Note that all submitted documents must be correctly certified and be in English or translated into English to be acceptable. More information on the certification process can be found in Step 2 [Certifying Documents](#). We may be required to request additional information to meet our regulatory obligations and this will be required in all circumstances if the relationship is high risk.

Digital or Crypto Currency - We will not accept funds directly from any digital or crypto currency account or a transfer agent that transacts in digital or crypto currency. All funds must be received directly from a bank account held with a regulated Bank.

International Pension Product (International SIPP)

Where evidence of SOW is required for our international pension due to residency, value or for another reason which triggers our enhanced due diligence requirements, and the transfer is from a UK registered pension scheme; to evidence SOW for the accumulated pension we will require a full biography letter evidencing the employment history related to the funding of the pensions to be transferred and detailing if it was employer, employee contributions or both which has made up the transfer value for each employment period.

We may ask for verification of employment and income or request a copy of a contribution statement provided by a previous pension provider.

In relation to SOF for the pension transfer we will require a formal statement from the previous pension provider/s providing evidence of the value and a breakdown of the accumulated pension benefits to be transferred.

Retired individuals

Morningstar Wealth understands that for retired individuals it may be difficult to obtain evidence of source of funds/source of wealth as retirement may have happened some time ago. In these circumstances, it is acceptable for a letter to be provided from a regulated firm or someone who would be considered as a suitable certifier, noted above, confirming how the wealth was accumulated.

Individuals not in employment

If an individual is not currently working, we need to understand how the funds being placed into an investment have been accumulated prior to ceasing employment. In these circumstances, provide details of the last role undertaken including annual income at the time the employment ceased, the job title, employment industry and employer name.

It is also common for non-working spouses to establish accounts in their own name and for funds to be paid by the working spouse. In this circumstance, we need information in relation to the SOF/SOW for the spouse which should include employment status, annual income, job title, employment industry and employer name.

Electronic statements are only acceptable if they have been downloaded from the providers website, are saved in pdf format and show the name of the provider and the customer's name and address. The use of screenshots is not permissible.

Step 4 – Clients who are Nationals of or born in Prohibited Countries

As noted within the [Country Risk Tables](#), there are countries where Morningstar Wealth will not do business with for clients who are resident in or have close links to these countries. However, for nationals or clients born in these countries who are living outside of their home/birth country, we may be able to onboard. However, we would need a full understanding of the links the client has to their home/birth country. Include the following information in the form of a letter on headed paper when sending through the CDD documents:

- What links the client has to their home/birth country (such as whether they own property or hold bank accounts in the country and how often do they visit);
- Whether any income is derived from that country;
- When they left the country and information on their employment history, before and after leaving the country;
- Whether there is any intention to return to their home country in the near future

Note that we will be unable to onboard Russian or Belarus nationals.

Step 5 FATCA and Common Reporting Standards (CRS)

A TIN or equivalent is required for FATCA and Common Reporting Standards. This information must be included within the application form.

If you have a US reporting requirement, include the relevant W8 or W9 form.

Jersey Residents:

For the purposes of reporting on Jersey residents, under the Inter-governmental Agreements (IGA), the taxpayer identification number (TIN) will be the taxpayer's Jersey social security number. Social security numbers begin with two letters, usually JY, followed by six digits, and a letter: A, B, C, or D. An example would be JY000000A. The TIN for a Jersey entity is the tax reference number, which takes the format of two letters and up to five digits.

Others:

Below are some examples for what would be classified as a TIN:

- In the UK, the TIN is the Unique Taxpayer Reference (UTR) or the National Insurance Number (NINO).
- In Ireland, the TIN is the Personal Public Service Number (PPS No).
- In the USA, the TIN is either a Social Security Number (SSN) or an Individual Taxpayer Identification Number (TIN).
- In Hong Kong, the Hong Kong Identity Card (HKID) Number serves as a TIN for individuals;
- In Singapore, the National Registration Identity Card (NRIC) number is used;

Note: Where a jurisdiction does not issue a TIN or other unique identifier, date of birth will be used for reporting purposes.

Step 6 Send all documentation to Morningstar Wealth

Once documentary evidence is gathered, complete the following steps:

- 1. Complete** the application form ensuring that **all** applicable fields are completed fully and accurately.

2. **Attach** required [identification documents](#), including verification of address, and [evidence of SOF/SOW](#) if required and if the customer is a [national of a prohibited country](#), provide the biography letter on headed paper confirming the links to their home/birth country. Include the relevant IRS tax forms (e.g. W8 or certain W9 forms), as appropriate.

3. **Submit** all paperwork to:

Morningstar Wealth International Limited
3rd Floor, Salisbury House
1-9 Union Street, St Helier
Jersey JE2 3RF

Alternatively, if based in the **Middle East** or **Asia**, you can send the documents to:

Unit 4, Level 3
Gate Village 8,
PO Box 507343
DIFC, Dubai, UAE,

If you have any questions about the information contained in this document, please contact us as per below:

Phone: UK +44 808 178 5125, UAE +971 800 03 210 93, Hong Kong +852 3001 6033, Singapore +65 3138 6837

Email: advisersupport.mwp@morningstar.com

Step 7 Trigger event and regular reviews

As a regulated investment business in Jersey, we are bound by our local regulations to undertake regular reviews of all existing customers to understand if any changes have taken place which would change the risk profile of the relationship. These reviews can happen when a trigger event occurs, such as a move to a different country or when the regular review cycle falls due. This requirement is noted within the [Money Laundering \(Jersey\) Order 2008](#) with guidance on the interpretation of the Order noted within the [AML CFT CPF Handbook](#) issued by the Jersey Financial Services Commission.

At the review stage, we have an obligation to understand the relationship as a whole and this often means that additional information or documentation is required which was not needed at the time of onboarding. We will therefore need to reach out to you at certain times to gain the required documentation and information to support the review. Please can you ensure that you give these requests your earliest attention.

Step 8 Receipt of funds

Note that funds must be remitted to us from an account in the investors name to be acceptable or from another provider if funds are being transferred from an existing investment. We will not accept payments from third parties.

Appendix One – Evidence of identity and address verification

This section confirms what documents that we will accept for evidence of identity and address verification.

Individual clients (Sole and Joint accounts)

Individual Client – Standard Risk

You must obtain:

- One certified photo ID (passport / driving licence / national ID)
- One certified proof of address (≤ 3 months old)

Certification requirements:

- Documents must be certified within the last 3 months
- Copies must be in colour and show the full document

Only required if applicable:

☐ Second ID (high risk customers only)

☐ Locator address (exceptional circumstances – see Appendix A)

Additional requirements for High Risk Customers

- Two forms of certified identification
- Evidence of Source of Funds and Source of Wealth

Individual (Sole or joint account)	
CERTIFIED IDENTIFICATION EVIDENCE (must be current and certified within the last 3 months)	Any one of the following (note that all identification documents must be in colour and the full document must be visible): • Passport • Driving licence • National ID card/residence visa For HIGH risk customers, 2 forms of identification will be required.
CERTIFIED RESIDENTIAL ADDRESS EVIDENCE (must be less than three months old unless specified)	Acceptable proof of address (any one of the following): <u>Financial documents</u> • Bank statement (including credit card) • Income tax statement (≤ 12 months old) <u>Utilities & government</u> • Utility bill (water/electricity) • Rates or council tax statement • Social security or national insurance letter <u>Employment or tenancy</u> • Employer letter (must include contact details) • Signed rental or lease agreement Important rules • Screenshots are not acceptable • Electronic documents must be original PDFs downloaded from provider websites • Documents must show full name and address

Companies (Legal Entities)

This guidance applies to all corporate clients (including private and regulated companies).

Step 1

Confirm the Company's Legal Existence and Authority by supplying the following documents (unless available from a reliable public registry):

- Certified copy of the Certificate of Incorporation
- Certified copy of the regulatory licence or registration certificate, where applicable, confirming:
 - Licence permissions
 - Any regulatory conditions
- Certified copy of the Memorandum and Articles of Incorporation

Step 2

Identify Ownership, Control and Management - you must identify and verify all relevant persons, including:

- Directors
- Ultimate beneficial owners
- Persons exercising control (legal or otherwise)
- Authorised signatories

Required documentation:

- Names of all directors and persons holding a legal, beneficial and/or controlling ownership or interest
- CDD for each individual (in line with the Individual Client requirements)
- Certified copy of the Authorised Signatory List

Where a shareholder or controller is not an individual - Full details and CDD must be obtained for the underlying individual(s) who ultimately own or control that entity.

Step 3:

For privately owned companies only, you must also obtain:

- A certified ownership and control structure chart, showing:
 - All owners
 - Controllers
 - Percentage interests (where available)

Step 4

Provide source of funds and source of wealth information

Standard risk relationships

You must provide within the application form:

- Details of Source of Funds
- Details of Source of Wealth

Higher risk relationships

You must provide:

- Evidence to support both source of funds and source of wealth
- Latest audited financial statements

Trusts

1. Corporate Trustee

The following are always required

- Certified copy of the Certificate of Incorporation (unless available via registry);
- Certified copy of the regulatory licence or registration certificate or extract from the regulator's website (where applicable);
- Certified copy of the Memorandum and Articles of Association;
- Certified structure chart;
- Certified Authorised Signatory List; and
- Names and CDD for all trustees (in line with Individual Client requirements)

1a. Underlying Trust

The following are always required:

- Certified copy of the Trust Deed
- Certified copy of the Deed of Appointment of Trustee
- Names and details of:
 - Settlor
 - Protector (if applicable)
 - Beneficiaries or objects of power
 - Any person exerting control over the trust
- Confirmation of Source of Funds and Source of Wealth for:
 - The settlor
 - Any person who has settled capital into the trust

1b. Additional requirements for higher risk trust relationships

Where the trust relationship is assessed as higher risk, you must also provide:

- CDD for settlor, protector and beneficiaries (with a vested interest) (in line with Individual Client requirements)
- Evidence supporting source of funds and source of wealth
- Certified copies of financial statements and/or audited financial statements (where applicable)

2. Individual Trustee (including the underlying trust)

2a. Trustee

You must provide:

- Certified copy of the regulatory licence or registration certificate (where applicable)
- Certified confirmation of signatories
- Full CDD for each trustee and authorised signatory (in line with the Individual Client requirements)

2b. Underlying Trust

You must provide:

- Certified copy of the Trust Deed
- Certified copy of the Deed of Appointment of Trustee(s)
- Names, addresses and dates of birth for:
 - Settlor
 - Protector (if applicable)
 - Beneficiaries or objects of power
- CDD for each of the above individuals

2c. Additional requirements for higher risk trust relationships

Where the trust relationship is assessed as higher risk, you must also provide:

- Evidence of Source of Funds and Source of Wealth for:
 - The settlor

- Anyone who has settled capital into the trust
- Certified copies of financial statements and/or audited financial statements (where applicable)

Important note on individuals connected to trusts

For settlors, beneficiaries with a vested interest, appointed protectors, beneficial owners or objects of power:

- Please refer to the “Client is an Individual” section for detailed CDD requirements.

For reference, a vested interest is an entitled benefit that can be conveyed to a separate party.

Pension Trustee

The following is required:

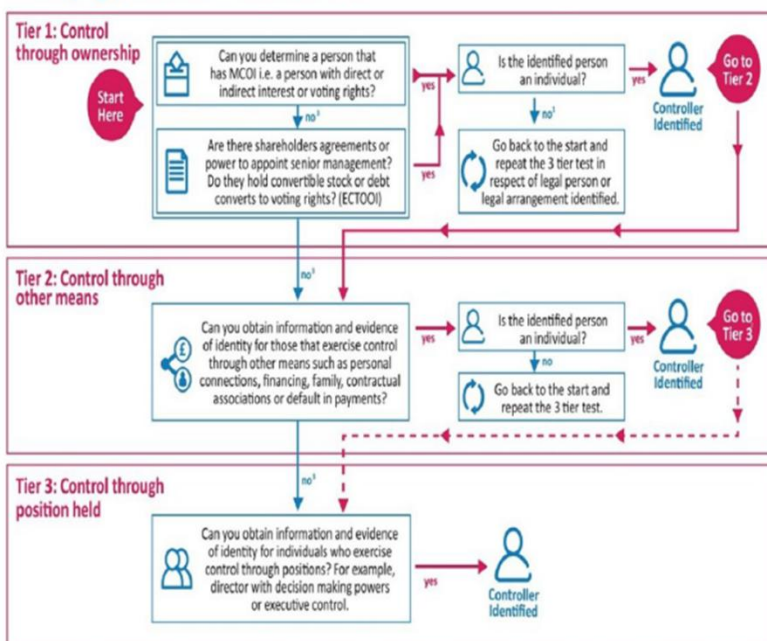
- Certified copy of regulatory license or registration certificate or an extract from the website of the company's regulator
- Certified copy of Certificate of Incorporation (unless this can be sourced from web-based company registry) or an extract from the company registry website
- Certified copy of the regulated pension or savings scheme certificate.
- Authorised Signatory List.
- Certified copy of Deed of Appointment of Trustee (if applicable)
- CDD for each Trustee (see client is a Natural Person section above).
- Register of Directors
- Shareholder register & CDD for all shareholders

Additional requirements for higher risk relationships where applicable

- Certified copies of Financial Statements and/or audited financial statements

Where a shareholder is not an individual, provide full details and CDD for the underlying individual(s) who ultimately own or control that shareholder. For non-personal relationships, use the '[Identifying Controllers – The 3 tier test](#)' published by the JFSC to ensure all parties are being identified:

Identifying Controllers - The 3 tier test



Note that ownership and control are looked at cumulatively, and individuals identified at any tier require full CDD.

Note that we may be required to request additional information to meet our regulatory obligations. Legal entities may also be required to provide a detailed AML questionnaire.

Appendix Two – Source of funds and source of wealth acceptable documentary evidence

DESCRIPTION	DOCUMENTARY EVIDENCE
COMPANY SALE	- Copy of Share Sale Agreement; or - Copy of letter/statement confirming the sale from either a solicitor/lawyer and/or accountant (regulated)
INHERITANCE	- Grant of Probate which must include the value of the estate; or - Signed letter from solicitor/lawyer confirming the value of the inheritance, the name of the deceased and the date the inheritance was paid
PROPERTY SALE	- Copy of the Sale Contract/Agreement; or - Copy of letter/statement confirming the sale from either a solicitor/lawyer and/or accountant (regulated)
INCOME FROM EMPLOYMENT	- Latest 3 months' payslips and where a bonus is applicable and is not included within the payslips, a bonus statement showing the amount and date of payment; or - Bank statements clearly showing receipt of the most recent 3 months regular salary payments from named employer; or - Employer letter confirming annual salary on headed paper and signed by an authorised signatory of the firm; or - If self-employed, the latest set of audited accounts
SAVINGS	Copy of bank statements covering a 3-month period which shows total savings from accumulated wealth. If the statement does not evidence the accumulation, supply one of the above listed documents (e.g. if savings is from income, supply one of the required documents from the income section).
SHARE SALE	- Copy of the sale document; or - Copy of the Contract Note(s)
INVESTMENT	- Investment Certificates, Contract Notes or Statement(s); or - Confirmation from relevant investment company confirming name of the company and the current value; or - Bank statement(s) showing receipt of payment by investment company; or - Signed letter from regulated accountant/solicitor or lawyer detailing the investment
PENSION TRANSFERS / SURRENDERED POLICIES	- Letter from previous product provider confirming current value; or - Closing statement from previous product provider
DISTRIBUTION (e.g. from a Trust, Company or Foundation)	- Letter from the principals of the entity confirming that you are a beneficiary and in what capacity they are acting, together with a copy of the portfolio valuation or similar reflecting the sum distributed; or - Certified copy of the Deed of Distribution
LOTTERY WIN	- Letter from relevant organisation (lottery HQ, betting shop or casino) confirming date of win and value; or - Bank statement(s) showing funds deposited which includes the company name. - Copies of media coverage as supporting evidence (where applicable)
COMPENSATION SETTLEMENT	- Letter/Court Order from compensating body confirming the amount awarded and date of award; or - Signed Letter from solicitor/lawyer confirming the amount awarded to you in settlement and date of award
DIVORCE SETTLEMENT	- Letter/Court Order from relevant body confirming the amount awarded and the date of the settlement; or - Signed Letter from solicitor/lawyer confirming the amount awarded to you in settlement and the date of the settlement
GIFT	Due to the nature of this category, it may be necessary to provide multiple sources of evidence which will be dependent on the amount and source of the gift: Identification of the Grantor i.e. person gifting the monies (even if this is coming from their account), plus letter from Grantor* explaining the gift which clearly records that the monies are a gift;

	• In respect of gifts of £10,000 and above, the person gifting the money to provide evidence as to how they acquired the funds; • A copy of the Grantor's bank statement evidencing that the money was paid to the named person as gift or a copy of the client's bank statement showing the gifted monies being paid into the bank account; • If the gifted monies were paid into the client's account 3 or more months ago then we will also require a copy of a current bank statement to show the funds remain in the account; • Documentary evidence as to the Grantor's Source of Wealth as detailed in this table and if applicable the client's Source of Wealth; • If the gift is from a spouse and the husband and wife have different surnames, we will require a certified copy of their marriage certificate * Note that for circumstances which mean the transfer of assets between one individual to another (different investors) relating to Morningstar Wealth accounts, the letter must also include the following "I am waiving rights to the current beneficial ownership of the assets being gifted and do not require any cash in exchange for the gifting of these assets"
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Appendix Three - Country Risk Ratings

The following risk rating tables have been established based on evaluations conducted by international bodies such as Transparency International and the Financial Action Task Force (FATF). The ratings tables should be used as a guide to assess whether a customer has links (such as nationality, residency, business links) to a higher risk jurisdiction (risk category 2 or 3) which could prompt the need for enhanced due diligence.

Please contact us regarding any countries that are not on the list to obtain guidance on acceptability.

Risk Category 1			
Australia	Germany	Lithuania	Saudi Arabia
Austria	Greece	Luxembourg	Singapore
Belgium	Hungary	Mauritius	Slovakia
Canada	Ireland	Netherlands	South Korea
Czech Republic	Isle of Man	New Zealand	Spain
Denmark	Italy	Norway	Sweden
Estonia	Japan	Poland	Switzerland
Finland	Jersey, Guernsey, Alderney	Portugal	United Kingdom
France	Latvia	Qatar	United States
Georgia	Liechtenstein	Romania	

Risk Category 2			
Andorra	Dominica	Malta	Slovenia
Armenia	Estonia	Marshall Islands	South Africa
Bahrain	Fiji	Micronesia	St Kitts & Nevis
Barbados	Gibraltar	Mongolia	Taiwan
Bermuda	Greece	Morocco	Thailand
Botswana	Guyana	Nauru	United Arab Emirates
Brazil	Hong Kong	Namibia	Uruguay
Brunei	Iceland	Oman	
Cyprus	Macedonia	Puerto Rico	

Risk Category 3				
Albania	China	Ghana	Maldives	Suriname
Algeria	Columbia	Grenada	Mexico	Tajikistan
Antigua & Barbuda	Comoros	Guatemala	Moldova	Tanzania
Argentina	Costa Rica	Honduras	Palestine	Timor Leste
Aruba	Croatia	India	Panama	Togo
Azerbaijan	Curaçao	Indonesia	Paraguay	Trinidad & Tobago
Bahamas	Djibouti	Israel	Peru	Tunisia
Bangladesh	Dominican Republic	Jamaica	Philippines	Turkey
Belize	Ecuador	Jordan	Rwanda	Turkmenistan
Benin	Egypt	Kazakhstan	Senegal	Turks & Caicos
Bhutan	El Salvador	Kenya	Seychelles	Uganda
Burundi	Equatorial Guinea	Kosovo	Sierra Leone	Ukraine*
Cambodia	Eswatini (Swaziland)	Lesotho	Solomon Islands	Uzbekistan
Cape Verde	Ethiopia	Madagascar	Sri Lanka	Vanuatu
Cayman Islands	Gabon	Malawi	St Lucia	West Bank/ Gaza
Chile	Gambia	Malaysia	St Vincent	Zambia

For **Ukraine**, the following regions would remain prohibited and residents of these jurisdictions would not be onboarded: Donetsk People's Republic and Luhansk People's Republic regions of Ukraine

At the time of publication of these guidelines, Morningstar Wealth International Limited will not do business (either directly or through intermediaries) with persons in sanctioned countries or jurisdictions with strategic ML/TF deficiencies. For all residents in the below jurisdictions, onboarding would not be possible. For customers who are nationals of these countries, please see the guidance in Step 4				
Afghanistan	Chad	Iraq	Montenegro & Serbia	Somalia
Angola	Congo Republic	Korea (North)	Mozambique	South Sudan
Belarus	Cote d'Ivoire	Kuwait	Myanmar (Burma)	Sudan
Bolivia	Cuba (US dollar only)	Lao PDR (Laos)	Nepal	Syria
Bosnia & Herzegovina	Dem. Republic of Congo	Lebanon	Nicaragua	Venezuela
Bulgaria	Eritrea	Liberia	Niger	Vietnam
Burkina Faso	Guinea	Libya	Nigeria	Yemen
BVI	Guinea-Bissau	Mali	Pakistan	Zimbabwe
Cameroon	Haiti	Mauritania	Papua New Guinea	
Central African Republic	Iran	Monaco	Russia	

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