

# Anti-Money Laundering Information: Documents Required (Singapore)

This document sets out the due diligence documents a subscriber (or its/his intermediary) to a collective investment scheme ("Subscriber") must submit to satisfy the requirements of applicable Anti-Money Laundering and Countering Financing of Terrorism ("AML/CFT") legislation and regulations.

The Monetary Authority of Singapore ("MAS") 'Notice to Capital Markets Intermediaries on the Prevention of Money Laundering and Countering the Financing of Terrorism' (MAS Notice SFA04-N02) requires the holders of a capital markets services licence ("CMS Licence") and other exempt persons to, *inter alia*, verify the identity of all customers and their beneficial owners, and keep on record due diligence documents and an explanation on the source of funds of the same.

#### **Table of Contents**

- 1. General Requirements
- 2. Requirements Per Investor Category

**Individuals** 

Listed Companies/ State-Owned Enterprises (or their 100% Subsidiaries)

Regulated Institutions (including Banks)

Pooled Investment Vehicles (Pension Fund, Hedge Fund, Private Equity Fund, Fund of Fund, Venture Capital Funds)

Private Companies Established in Singapore



(Personal Investment Companies, Unquoted Companies)

Other Private Companies (Personal Investment Companies, Unquoted Companies)

Charities, Not-for-Profit Organizations (NPOs), and Non-Governmental Organizations (NGOs)

Clubs and Societies

Partnerships and Unincorporated Entities

Trusts

Nominee Accounts (Private Bank, Investment Adviser or Nominee Company)

**Notes** 

Types of Subscribers exempted from 'beneficial owner' identification requirements

General instructions

## 1. General Requirements

Request for information. The manager ("Manager") of a collective investment scheme ("Fund") generally holds a CMS Licence for fund management, or relies on a regulatory exemption. As part of the Manager's and Exocap's (as fund administrator appointed by the Manager) respective responsibilities to comply with applicable AML/CFT regulations under Singapore laws, they may each from time to time require a detailed verification of the Subscriber's identity, tax risk profile, and the source of funds for payment of the application monies. The Manager and Exocap each reserves the right to request such information as is necessary to verify the identity of an applicant and the source of such funds.

Provision of documents. All Subscribers must provide the documents listed in the investor category applicable to them (below). Only original or certified true copies of the required documents will be accepted. Please refer to the 'General Instructions for Provision of Documents' (below). Please note that the AML/CFT obligations of the Manager and Exocap each may differ. Accordingly, the Manager and Exocap each reserves the right to request, from time to time, further information as necessary including,



without limitation, information required to verify the identity of a Subscriber, tax risk profile, the source funds for payment of the application monies, and the identity of:

- (a) the Subscriber's connected parties ("Connected Party"), which: (i) in relation to a legal person (other than a partnership), means any director or any natural person having executive authority in the legal person; (ii) in relation to a legal person that is a partnership, means any partner or manager; and (iii) in relation to a legal arrangement such as a trust or other similar arrangement, means any natural persons having executive authority in the legal arrangement;
- (b) the Subscriber's beneficial owners and/or associates; and
- (c) the Subscriber's authorised signatories, which means the natural persons appointed to act on behalf of the Subscriber ("Authorised Signatory").

Importance of verification process. In accordance with applicable AML/CFT laws and regulations, requests for a transfer or payment of realization proceeds will not be effected until receipt of all outstanding documents required for verification of the requesting Subscriber's identity and the call-back procedure to confirm payment instruction not matching with the Manager's or Exocap's record is completed. None of the Manager and Exocap, or their agents or affiliates, accepts any responsibility for any loss caused as a result of any such delay for refusal to process transfer requests or effect payment of realization proceeds (as the case may be). Claims for payment of interest due to such delays are not accepted.

Where Subscriber's shareholders are entities. Where a Subscriber has entities as shareholders, these entities should provide their own registers (or equivalent document) in order to determine if there are any beneficial owners who exercise ultimate effective control over the company.

**Subscription Agreement.** References are made below to the subscription agreement ("**Subscription Agreement**") or any similar instrument a Subscriber is generally expected to enter into with the Manager and/or the Funds it manages.



## 2. Requirements Per Investor Category

Investor	Requirements
Category	
Individuals	<ol> <li>Passport or official ID document with photograph, full name (including any aliases), unique identification number, date of birth and nationality and name change document (if applicable).</li> </ol>
	2. Information on occupation or business (if not indicated in the Subscription Agreement).
	<ol> <li>Information on source of funds for investment (the information may be set out in a letter signed by the Subscriber, or may be indicated in the Subscription Agreement).</li> </ol>
	<ul> <li>4. Proof of residential address and (if different) current correspondence address (e.g. copy of utility bill or bank statement) dated less than three months and displaying full name. (P.O. Box mailing addresses are not acceptable.)</li> <li>5. Latest available bank statement or income statement, or other documentation to evidence status as an</li> </ul>
	"accredited investor".  Where a natural person acts or is appointed to act on behalf of the Subscriber (for example, an attorney under a power of attorney), please provide the information in 1, 2, and 3 in this
	section relating to 'Individuals' in relation to each such persons so authorised to act.
Listed Companies/ State-Owned Enterprises (or their 100% Subsidiaries)	<ol> <li>Certificate of incorporation or equivalent and (where appropriate) certificate of change of name.</li> <li>Details of the registered office, principal place of business and (if different) address of main office.</li> <li>Memorandum and articles of association or constitution or equivalent.</li> </ol>



- 4. Evidence (i.e. Bloomberg/Reuters/Stock Exchange profile) that the entity is listed on a Recognised Stock Exchange\* or is a subsidiary of the same.
- 5. List of directors (including name and unique identification number), or a letter from lawyer/accountant/company secretary to confirm the name and unique identification number of directors.
- 6. List of all Authorised Signatories (setting out full names and contact numbers) with specimen signatures and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 7. Confirmation that the investment is made for the company's own account and not on behalf of any other party (appropriately authorised letter).
- 8. Signed board resolution/confirmation to make the investment and conferring authority on those signing instructions.
- 9. Source of funds for investment (a statement in this Subscription Agreement or a signed letter will satisfy this requirement).
- 10. Most recent audited balance sheet (or unaudited if audited financial statements are not required to be prepared regularly) or other documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".
- 11. Information and supporting documentary proof of the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the listed company unless the listed company is: (a) listed on the Singapore exchange; or (b) listed on a stock exchange outside of Singapore that is subject to (i) regulatory disclosure requirements; and (ii) requirements relating to adequate transparency in respect of its beneficial



	owners (imposed through stock exchange rules, law or other enforceable means).
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Regulated	1. Certificate of incorporation or equivalent and (where
Institutions	appropriate) certificate of change of name.
(including	2. Details of the registered office, place of business and (if
Banks)	different) address of main office.
	3. Memorandum and articles of association or constitution or equivalent.
	4. Evidence that the Institution is supervised by the
	Relevant Authority* (extract from such authority's website).
	5. Company search e.g. search of file at relevant company
	registry.
	6. List of directors (including name and unique
	identification number), or letter from
	lawyer/accountant/company secretary to confirm the
	name and unique identification number of directors.
	7. Details of the institution's management and major
	business activities (may obtain from regulator's
	website/independent website).
	8. Details of the system of bank regulation and supervision
	in the respondent institution's country (rules and
	regulations which the banks are obliged to follow).
	9. Details of the institution's money laundering prevention
	efforts/procedures.
	10. Confirmation that the investment is made for the
	institution's own account and not on behalf of any other
	party (an appropriately authorised letter will suffice).
	11. Signed board resolution/confirmation to make the
	investment and conferring authority on those signing
	instructions.
	12. List of all Authorised Signatories (setting out full names
	and contact numbers) with specimen signatures and identification documents for each Authorised Signatory
	in line with items 1 & 2 of the requirements for
	"Individuals" set out above.
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- 13. Source of funds for investment (a statement on this Subscription Agreement or a signed letter will satisfy this requirement).
- 14. Most recent audited balance sheet (or unaudited if audited financial statements are not required to be prepared regularly) or other documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".
- 15. Information and supporting documentary proof of the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the bank unless the bank is a Specified Financial Institution.

Pooled
Investment
Vehicles
(Pension Fund,
Hedge Fund,
Private Equity
Fund, Fund of
Fund, Venture
Capital Funds)

- 1. Certificate of incorporation or equivalent and (where appropriate) certificate of change of name.
- 2. Prospectus (offering document) or equivalent.
- 3. Details of the registered office, place of business and (if different) address of main office.
- 4. Memorandum and articles of association or constitution or equivalent.
- 5. Register of Connected Parties (including name and unique identification number), or letter from lawyer/accountant/company secretary to confirm the name and unique identification number of the Connected Parties.
- 6. Identification documents for each Connected Party in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 7. Written confirmation that underlying investors have been identified and anti-money laundering checks have been carried out to FATF\*\* standards on the underlying investors in the Pooled Investment Vehicle. (Please request for a standard AML certification letter template from the Administrator for this purpose).



- 8. Confirmation on the source of funds for investment (an appropriately authorised letter will suffice if it is not indicated in this Subscription Agreement).
- 9. If the pooled investment vehicle has an investment manager, documentation evidencing the investment management relationship and identification documents in line with all of the requirements for the applicable category according to the investment manager's legal structure. For example, if the investment manager is a Specified Financial Institution, please provide documents required of a "Regulated Institution" set out above.
- 10. Signed board resolution/confirmation to make the investment and conferring authority on those giving instructions.
- 11. List of all Authorised Signatories (setting out full names and contact numbers) with specimen signatures and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 12. Most recent audited balance sheet (or unaudited if audited financial statements are not required to be prepared regularly) or documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".
- 13. Information and supporting documentary proof of the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the pooled investment vehicle unless the pooled investment vehicle is a Specified Financial Institution or is managed by a primary investment manager that is a Specified Financial Institution.

## Private Companies

1. Certificate of incorporation or equivalent and (where appropriate) certificate of change of name.



## Established in Singapore (Personal Investment Companies, Unquoted Companies)

- 2. Details of the registered office, place of business and (if different) address of main office.
- 3. Latest constitution or equivalent.
- 4. Certificate of incumbency / Relevant Authority's\* extract / ACRA business profile issued within 3 months.
- 5. Register of directors (including name and unique identification number\*\*\*\*) and identification documents for each director in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 6. Register of members and identification documents for each member or beneficial owner in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 7. Confirmation that the investment is made for the company's own account and not on behalf of any other party and information on the source of funds for investment (an appropriately authorised letter will suffice).
- 8. Annual report and latest audited financial statements or other documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".
- 9. Signed board resolution / confirmation to make the investment and conferring authority on those giving instructions.
- 10. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 11. Information on any association the company may have with other countries or jurisdictions (e.g. the location of the company's headquarters, operating facilities, branches, and subsidiaries).
- 12. Information on the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the private company and identification



documents for each such natural person in line with items 1 & 2 of the requirements for "Individuals" set out above.

**Note:** Where the company has an ownership structure which is made up of several layers, please follow the chain of ownership and provide documents at each layer until the ultimate beneficial owners (holding 25% or more) that are natural persons are identified, and identification document of the individuals who are ultimate beneficial owners in line with items 1 & 2 of the requirements for "Individuals" set out above.

**Note:** If the company is a Specified Financial Institution or is listed on a Recognised Stock Exchange\*, follow the requirements for "Regulated Institution" or "Listed Institutions" set out above.

## Other Private Companies (Personal Investment Companies, Unquoted Companies)

- 1. Certificate of incorporation, business registration certificate or equivalent and (where appropriate) certificate of change of name.
- 2. Details of the registered office, place of business and (if different) address of main office.
- 3. Memorandum and articles of association, constitution and/or equivalent constitutive documents.
- 4. Certificate of incumbency / Relevant Authority's\* extract issued within 3 months.
- 5. Register of directors (including name and unique identification number\*\*\*\*) and identification documents for each director in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 6. Register of members and Identification documents for each member or beneficial owner in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 7. Confirmation that the investment is made for the company's own account and not on behalf of any other party and information on the source of funds for investment (an appropriately authorised letter will suffice).



- 8. Annual report and latest audited financial statements or other documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".
- 9. Signed board resolution / confirmation to make the investment and conferring authority on those giving instructions.
- 10. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 11. Information on any association the company may have with other countries or jurisdictions (e.g. the location of the company's headquarters, operating facilities, branches, and subsidiaries).
- 12. Information on the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the private company and identification documents for each such natural person in line with items 1 & 2 of the requirements for "Individuals" set out above.

**Note:** Where the company has an ownership structure which is made up of several layers, please follow the chain of ownership and provide documents at each layer until the ultimate beneficial owners (holding 25% or more) that are natural persons are identified, and identification document of the individuals who are ultimate beneficial owners in line with items 1 & 2 of the requirements for "Individuals" set out above.

**Note:** If the company is a Specified Financial Institution or is listed on a Recognised Stock Exchange\*, follow the requirements for "Regulated Institution" or "Listed Companies" set out above.



Charities, Notfor-Profit Organizations (NPOs), and Non-Governmental Organizations (NGOs)

- Proof of formation i.e. certificate of incorporation / trust deed / constitution / by-laws together with a search (i.e. search of file at relevant registry) or any other government source showing live status of the charity NPO or NGO (if applicable) and (where appropriate) certificate of change of name.
- 2. Information about the nature of the organisation's activities and objectives.
- 3. Evidence of source of funds / major donors i.e. latest financial statement.
- 4. Documents in line with all of the requirements for the applicable investor category according to the organisation's legal structure. For example, if the organisation is registered as a company outside of Singapore, please provide documents required of a "Private Company Established Overseas" set up above.
- 5. List of committee members (if the organisation is run by a committee) or trustees (if the organisation is run by trustees) or equivalent Connected Parties and identification documents for each member / trustee / Connected Party in line with items 1 & 2 of the requirements for "individuals" set out above.
- 6. Signed board / committee resolution / confirmation to make the investment and conferring authority on those giving instructions.
- 7. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 8. Documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".
- 9. Information on: (a) (if the organisation is a legal person) the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the



organisation; (b) (if the organisation is a trust) the settlor, the trustee, the protector (if any), the beneficiaries (including every beneficiary that falls within the designated characteristic or class) and natural persons who ultimately own or control or have ultimate effective control over the trust; or (c) (if the organisation is a legal arrangement other than a trust) natural persons in equivalent or similar positions as described under (b) and identification document for each such natural person in line with items 1 & 2 of the requirements for "individuals" set out above.

**Note:** Where the organisation has a structure which is made up of several layers, please follow the chain of control or ownership and provide documents at each layer until the ultimate beneficial owners that are natural persons are identified, and identification document of the individuals who are ultimate beneficial owners in line with items 1 & 2 of the requirements for "Individuals" set out above.

### Clubs and Societies

- 1. Proof of formation i.e. certificate of incorporation / trust deed / constitution / by-laws together with a search (i.e. search of file at relevant registry) or any other government source showing live status of the organisation and (where appropriate) certificate of change of name.
- 2. Evidence of source of funds i.e. latest financial statement.
- 3. Documents in line with all of the requirements for the applicable investor category according to the organisation's legal structure. For example, if the organisation is registered as a company outside of Singapore, please provide documents required of a "Private Company Established Overseas" set up above.
- 4. List of chairman and trustees or equivalent Connected Parties and identification documents for each member/trustee/Connected Party in line with items 1 & 2 of the requirements for "individuals" set out above.



- 5. Signed board / committee resolution / confirmation to make the investment and conferring authority on those giving instructions.
- 6. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 7. Documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".
- 8. Information on: (a) (if the organisation is a legal person) the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the organisation; (b) (if the organisation is a trust) the settlor, the trustee, the protector (if any), the beneficiaries (including every beneficiary that falls within the designated characteristic or class) and natural persons who ultimately own or control or have ultimate effective control over the trust; or (c) (if the organisation is a legal arrangement other than a trust) natural persons in equivalent or similar positions as described under (b) and identification document for each such natural person in line with items 1 & 2 of the requirements for "individuals" set out above.

**Note:** Where the organisation has a structure which is made up of several layers, please follow the chain of control or ownership and provide documents at each layer until the ultimate beneficial owners that are natural persons are identified, and identification document of the individuals who are ultimate beneficial owners in line with items 1 & 2 of the requirements for "Individuals" set out above.

## Partnerships and

1. Identification evidence for the general partners and all other partners or managers who are empowered to give



## Unincorporate d Entities

- instructions. If the partner is an entity, documentation requirements are in line with the requirements for that type of entity; or if the partner is an individual, documentation requirements are in line with all of the requirements for "Individuals".
- 2. Proof of formation (e.g. formation or registration certificate or equivalent) and (where appropriate) certificate of change of name from an independent registry.
- 3. Dated Partnership Deed / Agreement.
- 4. Mandate / deed / resolution from the partnership authorising the opening of an account or undertaking the transaction and conferring authority on those who will undertake transactions.
- 5. Evidence of the detailed address of the partnership (P.O. box mailing address is not acceptable).
- 6. Identification documents (in line with items 1 & 2 of the requirements for "Individuals" set out above) of all partners not otherwise disclosed in 1 above unless the partnership is a Pooled Investment Vehicle ("PV"), and: (a) the general partner is an entity which is a Specified Financial institution^; or (b) the primary investment manager of the PV is a Specified Financial institution^, and either the general partner or the primary investment manager (as the case may be) provides an AML certification letter in respect of the partners.
- 7. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 8. Annual report and latest audited financial statements or other documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".



- 9. Confirmation on the source of funds for investment (an appropriately authorised letter will suffice if it is not indicated in the Subscription Agreement).
- 10. Information on any association the partnership / unincorporated business may have with other countries and jurisdictions (i.e. the location of the entity's headquarters, operating facilities, branches and subsidiaries).
- 11. Information on the natural persons (whether acting alone or together) who ultimately own or control or have ultimate effective control of or who have executive authority in the partnership or unincorporated business (for example, the managing partner) and identification document for each such natural person in line with items 1 & 2 of the requirements for "individuals" set out above unless the partnership is a Pooled Investment Vehicle ("PV"); and: (a) the general partner is an entity which is a Specified Financial institution^; or (b) the primary investment manager of the PV is a Specified Financial institution^, and either the general partner or the primary investment manager (as the case may be) provides an AML certification letter in respect of the partners.
- 12. Information on the partnership / unincorporated business' membership with relevant professional body (if any).

**Note:** Where the partnership or entity has an ownership structure which is made up of several layers (e.g. if the general partners is also another limited partnership), please follow the chain of ownership and provide identification documents of the individuals who are the ultimate beneficial owners in line with items 1 & 2 of the requirements for "individuals" set out above.

**Trusts** 

Scenario 1: Trustee is a Specified Financial Institution in a FATF\*\* country



- 1. Proof of formation i.e. certificate of incorporation / constitution / by-laws together with a search (i.e. search of file at relevant registry) or any other government source showing live status of the trustee and (where appropriate) certificate of change of name.
- 2. Extract of authorisation from the relevant regulator including records in a relevant and independent registry in the country of formation.
- 3. Evidence that the trustee is supervised by a Relevant Authority\* (extract from such authority's website).
- 4. AML reliance letter on company letterhead from the trustee in a FATF\*\* country, confirming that the trustee has undertaken identity and anti-money laundering checks to FATF\*\* standards on settlors and main beneficiaries, including grantor, protector, appointer and life tenant.
- 5. Trust deed (including relevant deed of retirement and appointment of trustees, if applicable).
- 6. Information and supporting documentary proof of business address and principal places of business of the trust.
- 7. Information about the nature, purpose and objectives of the trust (e.g. discretionary, testamentary).
- 8. Signed trustee resolution to make the investment and conferring authority on those instruction.
- 9. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 10. Confirmation on the source of funds for investment (an appropriately authorised letter will suffice if it is not indicated in the Subscription Agreement).
- 11. Audited financial statements (where available) or other documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the laws of the country or territory in which the offer or invitation is made") or "institutional investor".



12. List of names of the settlor, the trustee, the directors of the trustee, the protector (if any), and any person who has power over the disposition of the property that is subject to the trust, the beneficiaries (including every beneficiary that falls within the designated characteristic or class) and any natural person exercising ultimate ownership, ultimate control or ultimate effective control over the trust (including through a chain of control or ownership).

### Scenario 2: Trustee is an unregulated trustee

- Proof of formation i.e. certificate of incorporation / constitution / by-laws together with a search (i.e. search of file at relevant registry) or any other government source showing live status of the trustee and (where appropriate) certificate of change of name.
- 2. Trust deed (including relevant deed of retirement and appointment of trustees, if applicable).
- 3. Information and supporting documentary proof of business address and principal places of business of the trust.
- 4. Information about the nature, purpose and objectives of the trust (e.g. discretionary, testamentary).
- 5. Records in a relevant and independent registry in the country and jurisdiction of constitution.
- 6. Signed trustee resolution to make the investment and conferring authority on those instruction.
- 7. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 8. Confirmation on the source of funds for investment (an appropriately authorised letter will suffice if it is not indicated in the Subscription Agreement).
- 9. Audited financial statements (where available) or other documentation to evidence status as an "accredited investor" (or "an investor in an equivalent class under the



laws of the country or territory in which the offer or invitation is made") or "institutional investor".

10. List of names of the settlor, the trustee, the directors of the trustee, the protector (if any), and any person who has power over the disposition of the property that is subject to the trust, the beneficiaries (including every beneficiary that falls within the designated characteristic or class) and any natural person exercising ultimate ownership, ultimate control or ultimate effective control over the trust (including through a chain of control or ownership).

**Note:** Where the settlor, trustee, protector, or beneficiary has an ownership structure which is made up of several layers, please follow the chain of control or ownership and provide documents at each layer until the ultimate beneficial owners that are natural persons are identified, and identification document of the individuals who are ultimate beneficial owners in line with items 1 & 2 of the requirements for "Individuals" set out above.

## Nominee Accounts (Private Bank, Investment Adviser or Nominee Company)

Scenario 1: The third party (i.e. the nominee) is a Specified Financial Institution in FATF\*\* country

(Subscription on behalf of underlying investor and the third party is a Specified Financial Institution \(^\) located in a FATF\*\* country)

#### Scenario 1A: Omnibus account

- 1. Documents in line with the requirements applicable to the investor category relevant to the nominee's legal structure. For example, if the nominee is a Specified Financial Institution^, please provide documents required of a "Regulated Institution" set out above.
- 2. Documentation showing that the entity is regulated in a FATF\*\* country (e.g. extract of authorisation obtained by the third party from a relevant regulator).



- 3. List of Connected Parties and identification documents for each Connected Party in line with items 1 & 2 of the requirements for "individuals" set out above.
- 4. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 5. Confirmation on the source of funds for investment (an appropriately authorised letter will suffice if it is not indicated in the Subscription Agreement)
- 6. Information on the natural persons (whether acting alone or together) who ultimately own or have effective control of or who have executive authority over the account and identification documents for each such natural person in line with items 1 & 2 of the requirements for "Individuals" set out above
- 7. AML reliance letter on company letterhead from the institution.

**Note:** "Omnibus accounts", which may also be called "nominee" or "house accounts", are used when an intermediary subscribes on behalf of its customers (i.e. the investors). In such cases, the investments are usually acquired in the name of the intermediary, but there may be cases where the intermediary establishes an account with the pooled vehicle that specifies sub-accounts on behalf of the investors. In these cases, please provide the required documentation in line with Scenario 1B hereunder.

Scenario 1B: Named underlying investor (Subscription on behalf of named underlying investor)

1. Documents in line with the requirements applicable to the investor category relevant to the nominee's legal structure. For example, if the nominee is a Specified Financial Institution^, please provide documents required of a "Regulated Institution" set out above.



- 2. Documentation showing the entity is regulated in a FATF\*\* country (e.g. extract of authorisation obtained by the third party from a relevant regulator).
- 3. List of Connected Parties and identification documents for each Connected Party in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 4. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 5. Confirmation on the source of funds for investment (an appropriately authorised letter will suffice if it is not indicated in the Subscription Agreement)
- 6. Information on the natural persons (whether acting alone or together) who ultimately own or have effective control of or who have executive authority over the account and identification documents for each such natural person in line with items 1 & 2 of the requirements for "Individuals" set out above
- 7. List of names of all underlying investor(s).
- 8. Identification documentation of the named underlying investor(s) in line with all of the requirements for the applicable investor category or, if unavailable, provide an AML reliance letter on company letterhead from the institution.

Scenario 2: The third party (i.e. the nominee) is unregulated (Subscription is undertaken on behalf of underlying investor and the unregulated third party is located in a FATF\*\* member country)

1. Documents in line with the requirements applicable to the investor category relevant to the nominee's legal structure. For example, if the nominee is a private company, please provide documents required of "Private Companies" as set out above.



- 2. List of Connected Parties and identification documents for each Connected Party in line with items 1 & 2 of the requirements for "individuals" set out above.
- 3. List of Authorised Signatories with specimen signatures (setting out full names and contact numbers) and identification documents for each Authorised Signatory in line with items 1 & 2 of the requirements for "Individuals" set out above.
- 4. Confirmation on the source of funds for investment (an appropriately authorised letter will suffice if it is not indicated in the Subscription Agreement)
- 5. Information on the natural persons (whether acting alone or together) who ultimately own or have effective control of or who have executive authority over the account and identification documents for each such natural person in line with items 1 & 2 of the requirements for "Individuals" set out above
- 6. List of names of all underlying investor(s).
- 7. Identification documentation of the named underlying investor(s) in line with all of the requirements for the applicable investor category.
- 8. Information and supporting documentary proof of nominee relationship.

#### **Notes**

- A "Specified Financial Institution" is (a) a financial institution licensed, approved, registered (including a fund management company registered under Paragraph 5(1)(i) of the Second Schedule to the Securities and Futures (Licensing and Conduct of Business) Regulations or regulated by the Monetary Authority of Singapore or (b) a financial institution incorporated or established outside Singapore that is subject to and supervised for compliance and AML/CFT requirements consistent with standards set by the FATF\*\*.
- \* A "Recognised Stock Exchange" is one in a country which is a member of FATF\*\* or a recognised exchange as defined under the Securities and Futures Act (Cap.289) of Singapore (but excluding those exchanges in NCCTs\*\*\*); a "Relevant Authority" is the Monetary



Authority of Singapore or an equivalent authority in a jurisdiction that is a FATF\*\* member or a country with equivalent standards of antimoney laundering to those of the FATF\*\*.

- \*\* **FATF** Financial Action Task Force (www.fatf-gafi.org).
- \*\*\* **NCCTs** Non-Cooperative Countries and Territories as listed by the FATF\*\*.
- \*\*\*\* **Unique Identification Number** refers to Government issued identity card number, birth certification number or passport number.

## Types of Subscribers exempted from 'beneficial owner' identification requirements

- An entity listed on the Singapore Exchange.
- An entity listed on a stock exchange outside of Singapore that is subject to regulatory disclosure requirements and requirements relating to adequate transparency in respect of its beneficial owners consistent with the standards set by the FATF.
- A Singapore financial institution as set out in MAS Notice SFA04-N02, Appendices 1 and 2.
- A financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT requirements consistent with the standards set by the FATF.
- An investment vehicle where the manager is a Singapore financial institution or financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT requirements consistent with the standards set by the FATF.

#### **General instructions**

- (i) The passport / identification document copy must show the following: legible photo identification, legible signature, identification/passport number and country of issuance, issue and expiry dates, full name, date and place of birth and nationality.
- (ii) Proof of permanent address is usually provided by way of a bank statement or an original/certified copy of a recent utility bill issued not more than three months prior to the date on which such document is provided.
- (iii) "Certified": A certifier must be a suitably qualified person, such as a lawyer, certified public or professional accountant, a notary public. The certifier should sign the copy document (printing his/her name clearly



underneath) and clearly indicate his/her position/capacity, professional designation, professional number on it together with a contact address and telephone number. The certified document must be clear, legible, signed and dated no more than three months prior to the date of receipt. The certifier must indicate that the document is a true copy of the original and that the photograph is a true likeness of the person.

- (iv) Where documents are not in English, the document should be translated into English by a suitably qualified translator.
- (v) ID documents provided without a signature should contain the bearer of the document signature on the copy and the signature should be certified together with the document itself. The certifier must indicate the bearer of the document has signed in his/her presence.
- (vi) Where this Subscription Agreement is sent by email, the Subscriber must also send the original signed Subscription Agreement to the Manager at the address specified above. None of Exocap, the Manager or their duly appointed agents will be responsible to a Subscriber for any loss resulting from the non-receipt or illegibility of any Subscription Agreement sent by email, or for any loss caused in respect of any action taken as a consequence of such email believed in good faith to have originated from properly authorized persons.
- (vii) The Subscriber must wire the payment from an account in its name.