

Zeta Fund Services Limited

Customer Due Diligence Requirements

May 2025

Zeta Fund Services Limited (“Zeta”) provides corporate and fund administration services under Guernsey’s legal and regulatory environment. It is Zeta’s policy that it is at all times fully compliant with applicable laws, rules and codes of conduct, and operate in accordance with best industry practices where applicable. Zeta has adopted a risk-based approach with regards to exercising due diligence procedures and implementing financial crime controls.

This document has been created to show what information is required from different types of customers, along with the certification requirements for any documentation. If there are any questions or any clarification is needed, please do not hesitate to contact us through ops@zeta-fs.com.

IT IS IMPORTANT TO NOTE THIS DOCUMENT IS FOR INDICATION PURPOSE ONLY. IT MAY BE APPROPRIATE OR NECESSARY IN SOME SITUATIONS TO REQUEST ADDITIONAL DOCUMENTATION.

ANY REQUIREMENTS SET OUT IN THIS DOCUMENT WILL BE IN ADDITION TO ANY APPLICATION FORM REQUIRED AS PART OF THE ONBOARDING PROCESS.

The following pages are a guide to what page in this document should be referenced for the specific situation of the customer. If you are unsure what page to use or you do not believe you are covered by a page, contact ops@zeta-fs.com.

If you believe that you will not be able to provide the required documents or you believe that you may present higher or high risk factors, particularly if you are a politically exposed person, you are encouraged to contact ops@zeta-fs.com at the earliest opportunity to discuss the onboarding process.

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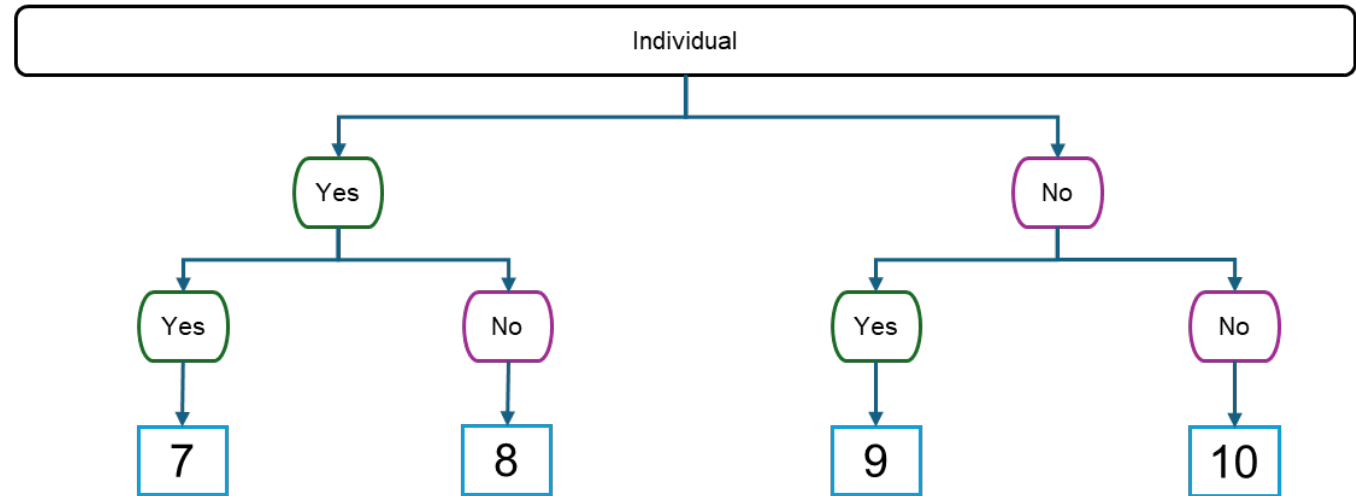
Flow Chart - Individuals

What type of customer is being onboarded?

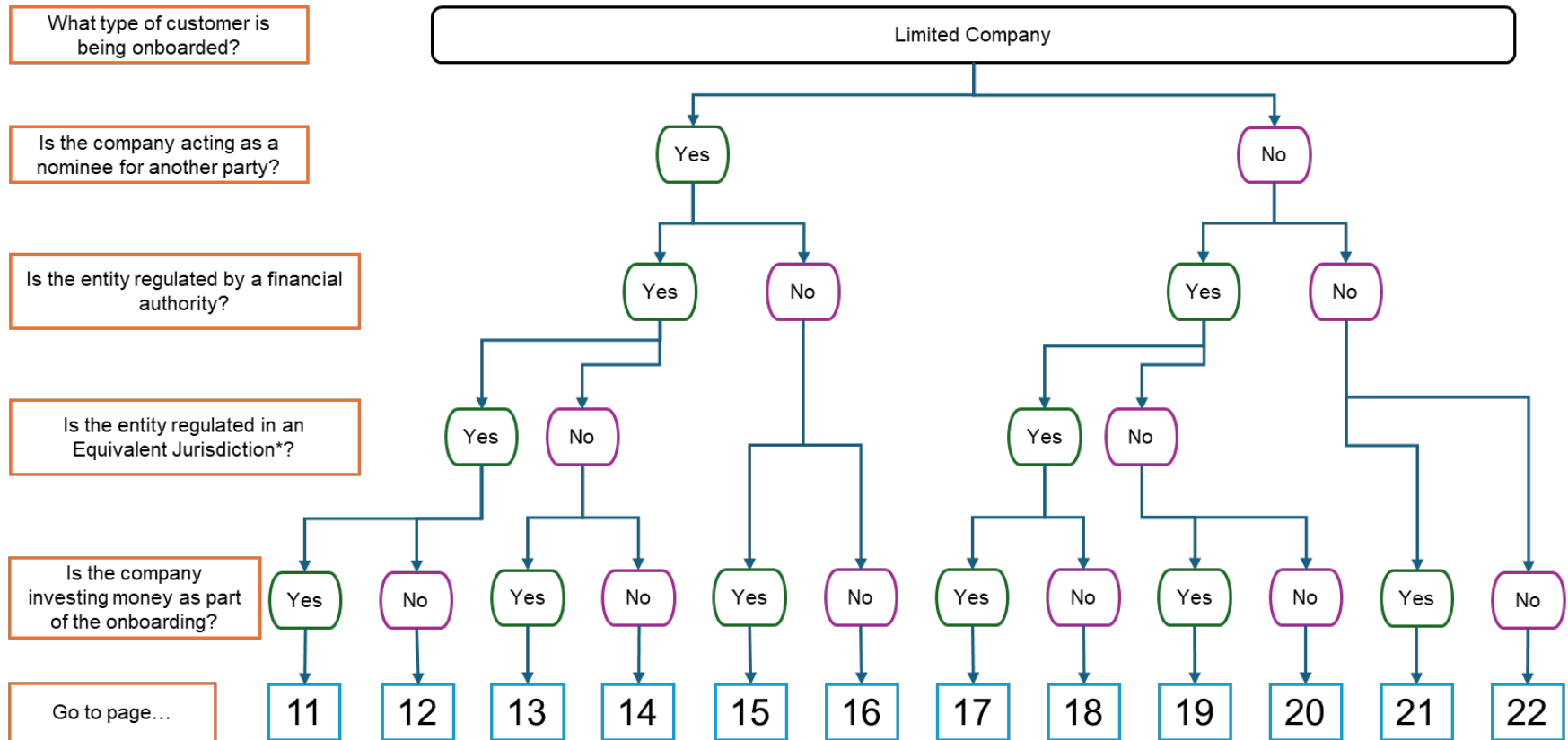
Is the individual acting as a nominee for another party?

Is the individual investing money as part of the onboarding?

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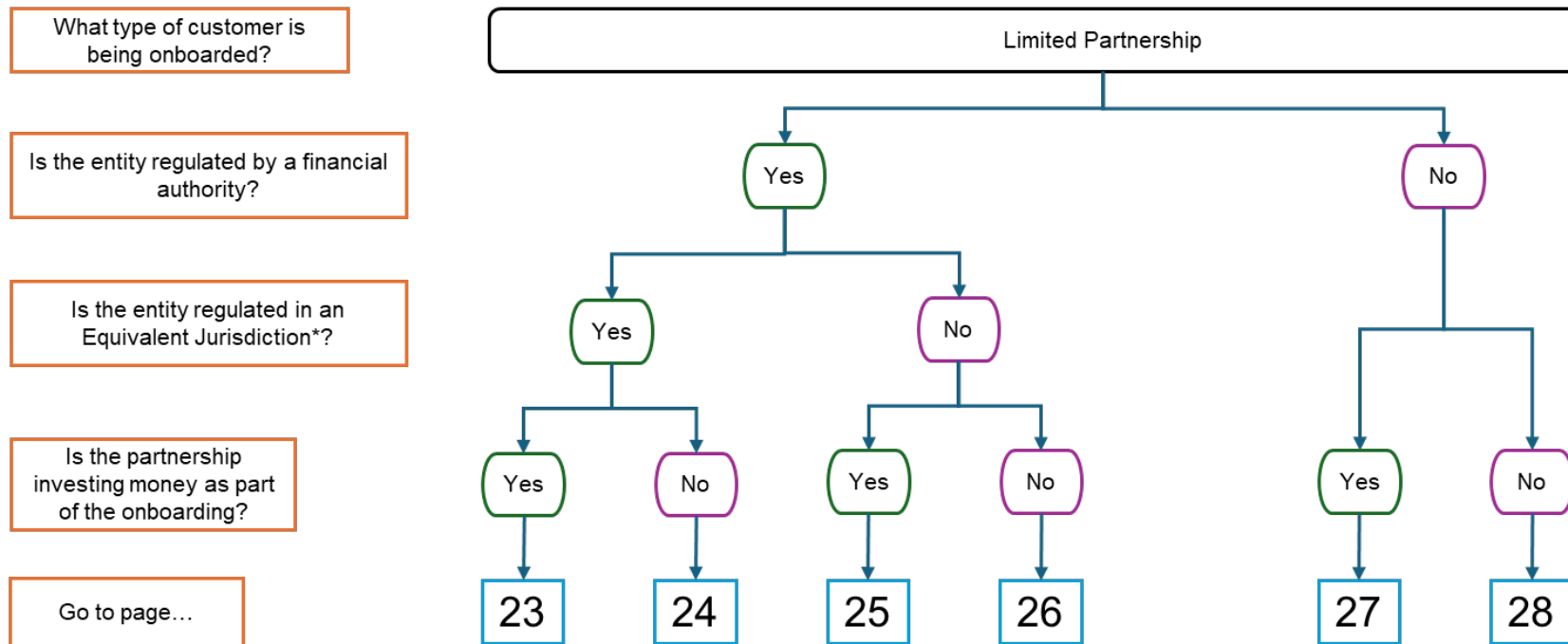


Flow Chart - Limited Companies



*please see page 34 for the list of equivalent jurisdictions

Flow Chart - Limited Partnerships



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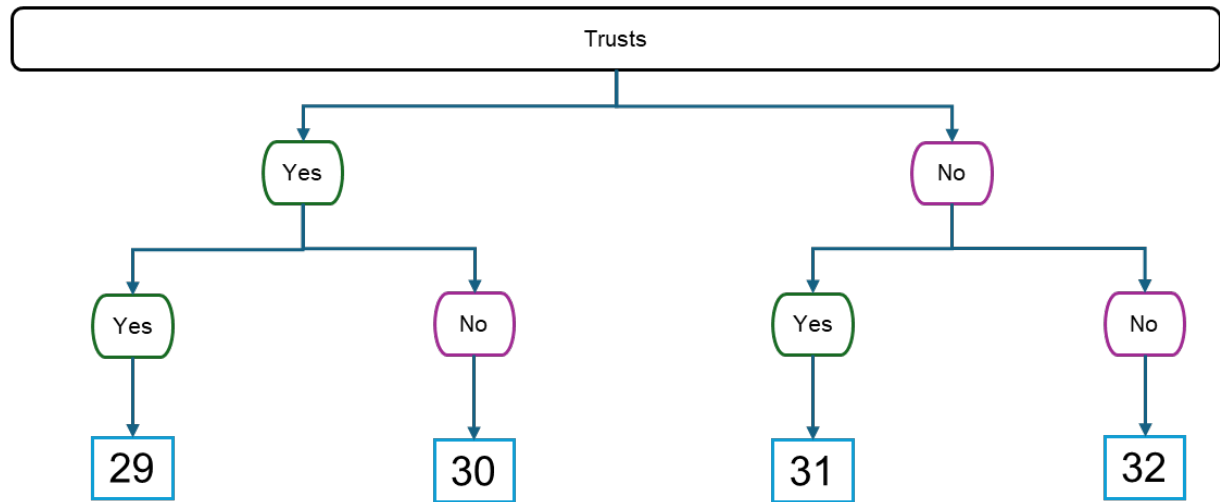
Flow Chart - Trusts

What type of customer is being onboarded?

Is the trustee regulated in Guernsey?

Is the trust investing money as part of the onboarding?

Go to page...



Use this page if:

- **You are an individual**
- **You are acting on behalf of another customer as a nominee**
- **You are investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Certified Photo ID
- Certified Proof of Address
- Confirmation of your employment status, occupation, employer, and employment location
- Confirmation if you have any income attributable to the following industries (please include the percentage of revenue where applicable):
 - o Oil, gas, mining, or similar extraction
 - o Pharmaceutical production or distribution
 - o Cryptocurrencies or other decentralised finance
 - o Private banking
 - o Military or Defence
 - o Gambling
 - o Global Shipping
- Completed Source of Wealth & Source of Funds Form
- Bank account statement (showing the account details from where the funds are being sent)
- Completed Tax Self-Certification Form
- For the customer on behalf of whom you are acting:
 - o The same documents and confirmations as if the customer was acting independently
 - o For example, if you are acting for another individual and you are investing money on behalf of that individual, the requirements for that individual are those listed on page 9

Use this page if:

- **You are an individual**
- **You are acting on behalf of another customer as a nominee**
- **You are not investing or sending money as part of the onboarding process**

Requirements:

- Certified Photo ID
- Certified Proof of Address
- Confirmation of your employment status, occupation, employer, and employment location
- Confirmation if you have any income attributable to the following industries (please include the percentage of revenue where applicable):
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 - o The same documents and confirmations as if the customer was acting independently
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Use this page if:

- **You are a limited company**
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- **You are regulated by a financial authority**
- **You are regulated in an Equivalent Jurisdiction**
- **You are investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Uncertified documentation sufficient to show:
 - o Legal name of the entity (and trading name, if applicable)
 - o Registered number of the entity
 - o Date of incorporation
 - o Place of incorporation
 - o Registered office
 - o Legal form
- Certified Proof of Regulation
- Confirmation of any mailing or correspondence address (if different from your registered office)
- Confirmation of your primary business
- Uncertified Register of Directors and for each Director:
 - o Uncertified Photo ID
 - o Uncertified Proof of Address

If the Register of Directors contains each Director's personal details (full name, date of birth, place of birth, nationality/ies, residential address), the provision of the Register of Directors will remove the need for the two documents above
- Certified authorised signatory list
 - o Or, if no such list exists, confirm if the Directors are the only authorised signatories of the company
 - o Or, if no such list exists, confirm which individuals can act for the company
 - For each individual, please provide:
 - Uncertified Photo ID
- Certified ownership structure chart showing any holding companies up to and including any natural person beneficial owners having 25% voting or income rights over the entity
 - o Please see the Beneficial Ownership Explanation for what further documentation will be required.
- Evidence of your bank account details (showing the account details from where the funds are being sent)
- Confirmation if your business has any revenue attributable to the following industries (please include the percentage of revenue where applicable):
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- Confirmation if you have any Bearer Shares in issue or have the ability to issue bearer shares
- Completed Source of Wealth & Source of Funds Form
- Documentation sufficient to show your adherence to your local financial crime regulations in respect of your onboarding and monitoring of your customers
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- Confirmation of your primary business
- Confirmation of why your business does not need to be regulated in your home jurisdiction to act as a nominee for another customer
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- **You are regulated in an Equivalent Jurisdiction**
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Requirements:

- Uncertified documentation sufficient to show:
 - o Legal name of the entity (and trading name, if applicable)
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- Completed Source of Wealth & Source of Funds Form
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 - For each individual, please provide:
 - Certified Photo ID
- Certified ownership structure chart showing any holding companies up to and including any natural person beneficial owners having 25% voting or income rights over the entity
 - o Please see the Beneficial Ownership Explanation for what further documentation will be required.
- Evidence of your bank account details (showing the account details from where the funds are being sent)
- Confirmation if your business has any revenue attributable to the following industries (please include the percentage of revenue where applicable):
 - o Oil, gas, mining, or similar extraction
 - o Pharmaceutical production or distribution
 - o Cryptocurrencies or other decentralised finance
 - o Private banking
 - o Military or Defence
 - o Gambling
 - o Global Shipping
- Confirmation if you have any Bearer Shares in issue or have the ability to issue bearer shares
- Completed Source of Wealth & Source of Funds Form
- Completed Tax Self-Certification Form

Use this page if:

- **You are a limited company**
- **You are not acting on behalf of another customer as a nominee**
- **You are not regulated by a financial authority**
- **You are not investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Certified documentation sufficient to show:
 - o Legal name of the entity (and trading name, if applicable)
 - o Registered number of the entity
 - o Date of incorporation
 - o Place of incorporation
 - o Registered office
 - o Legal form
- Confirmation of any mailing or correspondence address (if different from your registered office)
- Confirmation of your primary business
- Certified Register of Directors and for each Director:
 - o Certified Photo ID
 - o Certified Proof of Address

If the Register of Directors contains each Director's personal details (full name, date of birth, place of birth, nationality/ies, residential address), the provision of the Register of Directors will remove the need for the two documents above
- Certified authorised signatory list
 - o Or, if no such list exists, confirm if the Directors are the only authorised signatories of the company
 - o Or, if no such list exists, confirm which individuals can act for the company
 - For each individual, please provide:
 - Certified Photo ID
- Certified ownership structure chart showing any holding companies up to and including any natural person beneficial owners having 25% voting or income rights over the entity
 - o Please see the Beneficial Ownership Explanation for what further documentation will be required.
- Confirmation if your business has any revenue attributable to the following industries (please include the percentage of revenue where applicable):
 - o Oil, gas, mining, or similar extraction
 - o Pharmaceutical production or distribution
 - o Cryptocurrencies or other decentralised finance
 - o Private banking
 - o Military or Defence
 - o Gambling
 - o Global Shipping
- Confirmation if you have any Bearer Shares in issue or have the ability to issue bearer shares
- Completed Source of Wealth & Source of Funds Form (Source of Funds will not be applicable)

Use this page if:

- **You are a limited partnership**
- **You are regulated by a financial authority**
- **You are regulated in an Equivalent Jurisdiction**
- **You are investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Uncertified documentation sufficient to show, for the limited partnership:
 - o Legal name of the entity (and trading name, if applicable)
 - o Registered number
 - o Date of establishment
 - o Place of establishment
 - o Registered office
 - o Legal form
- Certified Proof of Regulation for the limited partnership
- Confirmation of any mailing or correspondence address (if different from your registered office) for the limited partnership
- Confirmation of the limited partnership's primary business
- Certified ownership structure chart showing any holding companies up to and including any natural person beneficial owners having 25% voting or income rights over the limited partnership
 - o Please see the Beneficial Ownership Explanation for what further documentation will be required.
- Evidence of the limited partnership's bank account details (showing the account details from where the funds are being sent)
- Confirmation if the limited partnership has any revenue attributable to the following industries (please include the percentage of revenue where applicable):
 - o Oil, gas, mining, or similar extraction
 - o Pharmaceutical production or distribution
 - o Cryptocurrencies or other decentralised finance
 - o Private banking
 - o Military or Defence
 - o Gambling
 - o Global Shipping
- Confirmation if the limited partnership has any Bearer Shares in issue or have the ability to issue bearer shares
- Completed Source of Wealth & Source of Funds Form
- Completed Tax Self-Certification Form
- For the general partner of the limited partnership:
 - o The same documents and confirmations as if the general partner was acting independently
 - o For example, if the general partner is a regulated company in an equivalent jurisdiction, the requirements for that general partner are those listed on page 18
 - o For the purposes of onboarding the general partner, the general partner is not taken as investing or sending any money as part of the relationship

Use this page if:

- **You are a limited partnership**
- **You are regulated by a financial authority**
- **You are regulated in an Equivalent Jurisdiction**
- **You are not investing or sending money as part of the onboarding process**

Requirements:

- Uncertified documentation sufficient to show, for the limited partnership:
 - o Legal name of the entity (and trading name, if applicable)
 - o Registered number
 - o Date of establishment
 - o Place of establishment
 - o Registered office
 - o Legal form
- Certified Proof of Regulation for the limited partnership
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 - o Global Shipping
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Use this page if:

- **You are a limited partnership**
- **You are regulated by a financial authority**
- **You are not regulated in an Equivalent Jurisdiction**
- **You are investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Certified documentation sufficient to show, for the limited partnership:
 - o Legal name of the entity (and trading name, if applicable)
 - o Registered number
 - o Date of establishment
 - o Place of establishment
 - o Registered office
 - o Legal form
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 - o Private banking
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 - o Cryptocurrencies or other decentralised finance
 - o Private banking
 - o Military or Defence
 - o Gambling
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 - o For example, if the general partner is a regulated company in an equivalent jurisdiction, the requirements for that general partner are those listed on page 18
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Use this page if:

- **You are a limited partnership**
- **You are not regulated by a financial authority**
- **You are investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Certified documentation sufficient to show, for the limited partnership:
 - o Legal name of the entity (and trading name, if applicable)
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 - o Oil, gas, mining, or similar extraction
 - o Pharmaceutical production or distribution
 - o Cryptocurrencies or other decentralised finance
 - o Private banking
 - o Military or Defence
 - o Gambling
 - o Global Shipping
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Use this page if:

- **You are a limited partnership**
- **You are not regulated by a financial authority**
- **You are not investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Certified documentation sufficient to show, for the limited partnership:
 - o Legal name of the entity (and trading name, if applicable)
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 - o The same documents and confirmations as if the general partner was acting independently
 - o For example, if the general partner is a regulated company in an equivalent jurisdiction, the requirements for that general partner are those listed on page 18
 - o For the purposes of onboarding the general partner, the general partner is not taken as investing or sending any money as part of the relationship

Use this page if:

- **You are a trust**
- **The trustee of the trust is regulated in Guernsey**
- **You are investing or sending money as part of the onboarding process (as an investor in a fund for example)**

Requirements:

- Certified documentation sufficient to show, for the trust:
 - o Legal name
 - o Registered number (if applicable)
 - o Date of establishment
 - o Proper law jurisdiction
 - o Parties to the trust, including:
 - Any settlor
 - Any trustee
 - Any beneficiary
 - Including the class of beneficiary (e.g. discretionary, fixed, etc.)
 - Any protector
 - Any other party having control over the trust's operations
- Completed Source of Wealth & Source of Funds Form
 - o If the Source of Wealth & Source of Funds of the trust is owed materially to the initial settlement or any subsequent settlements, this form will be needed for each settlor rather than the trust as a whole
- Evidence of the trust's bank account details (showing the account details from where the funds are being sent)
- Completed Tax Self-Certification Form
- Confirmation if the trust has any revenue attributable to the following industries (please include the percentage of revenue where applicable):
 - o Oil, gas, mining, or similar extraction
 - o Pharmaceutical production or distribution
 - o Cryptocurrencies or other decentralised finance
 - o Private banking
 - o Military or Defence
 - o Gambling
 - o Global shipping
- Confirmation if any beneficiaries have benefitted from the trust since establishment
 - o For any individual beneficiaries who have not benefited from the trust or any individual beneficiaries under the age of 18, please provide:
 - Full Name
 - Date of Birth
 - o For any individual beneficiaries who have benefitted from the trust, please provide:
 - The same documents and confirmations as if the individual was acting independently
 - These requirements are set out on page 10
- For the trustee:
 - o The same documents and confirmations as if the trustee was acting independently
 - o For Guernsey-regulated trustees, the requirements are set out on page 18
- For any individual who is a party to the trust (excluding trustees and beneficiaries)
 - o The same documents and confirmations as if the individual was acting independently
 - o These requirements are set out on page 10
- For any legal person who is a party to the trust (excluding trustees and individual beneficiaries)
 - o The same documents and confirmations as if the party was acting independently, but without any exceptions for simplified due diligence
 - o For example, any limited company that is a party to the trust must follow the requirements of page 20

Use this page if:

- **You are a trust**
- **The trustee of the trust is regulated in Guernsey**
- **You are not investing or sending money as part of the onboarding process**

Requirements:

- Certified documentation sufficient to show, for the trust:
 - o Legal name
 - o Registered number (if applicable)
 - o Date of establishment
 - o Proper law jurisdiction
 - o Parties to the trust, including:
 - Any settlor
 - Any trustee
 - Any beneficiary
 - Including the class of beneficiary (e.g. discretionary, fixed, etc.)
 - Any protector
 - Any other party having control over the trust's operations
- Completed Source of Wealth & Source of Funds Form (Source of Funds will not be applicable)
 - o If the Source of Wealth & Source of Funds of the trust is owed materially to the initial settlement or any subsequent settlements, this form will be needed for each settlor rather than the trust as a whole
- Confirmation if the trust has any revenue attributable to the following industries (please include the percentage of revenue where applicable):
 - o Oil, gas, mining, or similar extraction
 - o Pharmaceutical production or distribution
 - o Cryptocurrencies or other decentralised finance
 - o Private banking
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 - o Gambling
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 - Full Name
 - Date of Birth
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 - The same documents and confirmations as if the individual was acting independently
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 - o For Guernsey-regulated trustees, the requirements are set out on page 18
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 - o The same documents and confirmations as if the individual was acting independently
 - o These requirements are set out on page 10
- For any legal person who is a party to the trust (excluding trustees and individual beneficiaries)
 - o The same documents and confirmations as if the party was acting independently, but without any exceptions for simplified due diligence
 - o For example, any limited company that is a party to the trust must follow the requirements of page 20

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- **You are a trust**
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Requirements:

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 - o Legal name
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 - Any protector
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- Confirmation if any beneficiaries have benefitted from the trust since establishment
 - o For any individual beneficiaries who have not benefited from the trust or any individual beneficiaries under the age of 18, please provide:
 - Full Name
 - Date of Birth
 - o For any individual beneficiaries who have benefitted from the trust, please provide:
 - The same documents and confirmations as if the individual was acting independently
 - These requirements are set out on page 10
- For the trustee:
 - o The same documents and confirmations as if the trustee was acting independently
 - o For non-Guernsey-regulated trustees, the requirements are set out on page 22
- For any individual who is a party to the trust (excluding trustees and beneficiaries)
 - o The same documents and confirmations as if the individual was acting independently
 - o These requirements are set out on page 10
- For any legal person who is a party to the trust (excluding trustees and individual beneficiaries)
 - o The same documents and confirmations as if the party was acting independently, but without any exceptions for simplified due diligence
 - o For example, any limited company that is a party to the trust must follow the requirements of page 20

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- **You are a trust**
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 - o The same documents and confirmations as if the trustee was acting independently
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 - o The same documents and confirmations as if the individual was acting independently
 - o These requirements are set out on page 10
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 - o The same documents and confirmations as if the party was acting independently, but without any exceptions for simplified due diligence
 - o For example, any limited company that is a party to the trust must follow the requirements of page 20

Acceptable Documents

Zeta will accept a wide variety of documents to complete the requirements as long as they meet certain expectations, including:

- The document is valid (i.e. has not expired);
- The document is legible;
- The document clearly shows the information required; and
- The document is in English
 - o It is acknowledged that entities established in non-English-speaking countries may not have constitutional or other documents available in English. In these cases, Zeta will assess any documents provided on case-by-case basis. If required, Zeta will request translation of certain parts of documents by an accredited translator.

There are some document-specific requirements for individual documents:

- For Photo IDs:
 - o These can be passports, national identity cards, or driving licenses, as long as they contain:
 - Full name
 - Date of Birth
 - Nationality
 - Place of Birth
 - Signature
 - Photo
- For Proof of Addresses:
 - o These can be utility bills, government correspondence, or similar
 - o These cannot be mobile phone bills
 - o These must be dated within six months, though three months is encouraged
 - o There is an exception to this if:
 - A lease agreement is provided as a proof of address, in which case the lease agreement must be still active but need not be dated within six months; or
 - A national identity card or driving license is provided as a proof of address, in which the document must still be active but need not be dated within six months.

A document cannot be used as both a Photo ID and a Proof of Address. Two separate documents must always be provided.

Zeta recognises that many countries now operate online company registries, or similar, that contain information about an entity. In most cases, Zeta is comfortable to rely on extracts from these registries. Entities may provide a weblink to their registry instead of documentation, but Zeta reserves the right to request documentation where the registry extracts are unclear, incomplete, or for any other reason necessary to process the onboarding of the entity.

Zeta will also accept, in most cases, documents certified through electronic signatures such as DocuSign or Adobe Sign. Entities are encouraged to provide the audit page produced when electronic signatures are generated and Zeta reserves the right to request this audit page or re-certification for any document.

Equivalent Jurisdictions

Below is the list of jurisdictions Guernsey's regulator consider as equivalent to Guernsey. Companies in these jurisdictions may qualify for a simplified due diligence process and this is represented in the previous pages.

To qualify for simplified due diligence processes, the entity must be regulated in the equivalent jurisdiction, not just incorporated in the jurisdiction, and be rated as low risk. Zeta reserves the right to conduct standard due diligence processes on any customer, no matter their regulatory or risk status.

This is a reproduction of Appendix C of the GFSC's Handbook on Countering Financial Crime – available [here](#). In the event of a discrepancy between Appendix C and this list, Appendix C shall take precedence.

Australia	Greece	Malta
Austria	Hong Kong	Netherlands
Belgium	Hungary	New Zealand
Bermuda	Ireland	Norway
Canada	Isle of Man	Portugal
Cyprus	Italy	Singapore
Denmark	Japan	Slovenia
Estonia	Jersey	Spain
Finland	Latvia	Sweden
France	Liechtenstein	Switzerland
Germany	Lithuania	United Kingdom
Gibraltar	Luxembourg	United States of America

Certifications

Many of the requests on the preceding pages include a need to provide certified documentation. Certification is an important process through which Zeta gains comfort that the documents it receives are genuine.

When certified documents are received, they must meet certain criteria to be accepted. Zeta reserves the right to reject any document not certified in accordance with this policy.

The Process of Certification

You must arrange to have a copy of the documents certified in the presence of a suitable certifier. The certifier must see the original document and affix specific wording to the copy of the document as well as their details.

Suitable Certifiers

The certification can be completed by any one of the following:

- Director or Company Secretary of a regulated business in an equivalent jurisdiction (see page 34)
- Lawyer or Notary
- Actuary
- Member of a professional body (e.g. Chartered Accountant)
- Member of law enforcement
- Government official or civil servant
- Director or Company Secretary certifying documents for the Company they represent
- Authorised signatories of the Customer
- Zeta employee

When certifying an individual's documents, a certifier cannot be a close family member of the individual.

The Wording of Certifications

For Photo ID documents – I hereby certify that this is a true and accurate copy of the original document that I have seen and the photograph bears a true likeness to the individual who I have met.

For any other documents – I hereby certify that this is a true and accurate copy of the original document that I have seen.

Where web links to company registries or regulators are provided in lieu of documents for entities, Zeta may be able to rely on these without additional certifications. However, in some cases, Zeta may request that the data is extracted and certified. Extracted and certified data will always need to be provided where a database or computer program is used to evidence information (for example, an extract of a register of directors from an internal database). In these cases, the wording must be – I hereby certify this document as a true copy retrieved from an online system, computer program, or external database.

What other information must be included in the certification?

The below must be included in the certification, as a minimum:

- The signature of the certifier;
- The full name of the certifier;
- The professional position or capacity held by the certifier (including professional body membership details where relevant);
- Details of at least one contact method (for example, postal address, contact telephone number, or e-mail address); and
- The date the certification was completed.

Zeta reserves the right to contact the certifier of any document to verify their capacity and validate any part of the certification.

Beneficial Ownership Explanation

Under Guernsey's regulations, beneficial ownership comprises a three-step test involving ownership, influence, and management. A Legal Person cannot be onboarded without identifying a beneficial owner at one of the three steps.

Definitions

Natural Person	An individual, not a company or other entity
Legal Person	An entity, not an individual. For the avoidance of doubt, Legal Person in this context includes, without limitation, legal arrangements such as trusts, foundations, and unincorporated limited partnerships
Customer	Zeta's Customer, being the person who is undergoing onboarding
Transparent Legal Person	A Legal Person listed on a Recognised Stock Exchange (or a majority-owned subsidiary of such) or a Legal Person regulated in Guernsey
Senior Managing Official	An executive director having responsibility for strategy or control over daily affairs of the Customer

Voting & Economic Shares

It is normal for shares in Legal Persons to contain both voting and economic rights. However, some Legal Persons split these and, in these cases, it is important to consider the owners of both types of shares. The definitions are below:

Voting Shares	These shares allow holders to vote on matters raised at shareholder meetings and can include the ability to fire directors or change key operations of the gal person. The shares give a level of control to the shareholder over the gal person even if they do not benefit monetarily from their shareholding.
Economic Shares	These shares allow holders to benefit from dividends from the company as well as proceeds from a liquidation. They will benefit monetarily from the business being conducted with Zeta, even if they do not control the Legal Person.

When disclosing the beneficial owners of Legal Person, beneficial ownership of both voting and ownership shares must be disclosed.

Step 1

A requirement in the onboarding of every Legal Person is the receipt of a certified ownership structure chart showing any holding companies up to and including any natural person beneficial owners having 25% voting or income rights over the limited partnership. This chart will be used in Step 1 of the Beneficial Ownership Test.

The first step concerns ownership of shares or voting rights, namely:

- Whether any Natural Person or Transparent Legal Person owns 25% or more of the Economic Shares in the Customer;
- Whether any Natural Person or Transparent Legal Person owns 25% or more of the Voting Shares in the Customer; or
- Whether any Natural Person or Transparent Legal Person owns any shares in the Customer that carry the right to appoint or remove a majority of directors of the Customer.

If the structure chart shows any Natural Persons fulfilling the ownership criteria (including any holding companies), each such Natural Person should be identified as a beneficial owner.

If the Customer has a Transparent Legal Person in its ownership structure, then the Transparent Legal Person should be regarded as the owner for purposes of beneficial ownership.

A Customer can have more than one beneficial owner. For example, if a Customer only has one class of shares and those shares are held half by a Natural Person and half by a Transparent Legal Person, both the Natural Person and the Transparent Legal Person will be recorded as beneficial owners.

The identification and verification requirements for Natural Persons or Transparent Legal Persons identified as beneficial owners are set out below.

If a Natural Person or a Transparent Legal Person is identified in Step 1, there is no need to move onto Step 2 or 3.

Step 2

This step is relevant where there are reasonable grounds to believe that the Customer is controlled by other means than shareholding or directorship, i.e. where someone identified in Step 1 is significantly influenced by another person or the Customer takes instructions from someone not identified at Step 1. If this occurs, Zeta is required to identify the Natural Person as a beneficial owner.

If a Natural Person is identified in Step 2, there is no need to move onto Step 3.

Step 3

This step (which must be followed if no Natural Persons or Transparent Legal Persons are identified in Steps 1 or 2), requires the identification of any director who meets the definition of Senior Managing Official given at the start of this section. This cannot be a non-executive director and the Senior Managing Official must be a Natural Person. Where a Customer is using Step 3 to identify its beneficial owner and only has corporate directors, this should be discussed with Zeta to identify a suitable Natural Person as beneficial owner.

Identification & Verification Requirements

For any Natural Person identified as a beneficial owner, the requirements are:

- Certified Photo ID
- Certified Proof of Address

If the Customer is regulated in an equivalent jurisdiction (see page 34), the documents do not need to be certified.

For any Transparent Legal Person identified as a beneficial owner, the requirements are:

- Web link as a proof of listing of the Transparent Legal Person (where applicable); or
- Web link as a proof of regulation in Guernsey of the Transparent Legal Person (where applicable).

Recognised Stock Exchanges

The following are recorded as Recognised Stock Exchanges for the purposes of the Beneficial Ownership Test:

- any regulated market within the meaning of the European Directive on Markets in Financial Instruments 2004/39/EU;
- the International Stock Exchange Authority Limited;
- the Australian Securities Exchange;
- the New York Stock Exchange;
- the National Association of Securities Dealers Automated Quotation System;
- the Cayman Islands Stock Exchange;
- the Bermuda Stock Exchange;
- the Hong Kong Stock Exchange;
- the Johannesburg Stock Exchange;
- the SIX Swiss Exchange;
- the London Stock Exchange Main Market, including the Alternative Investment Market and the Specialist Fund Segment;
- the Cboe Europe Equities Regulated Market; and
- Aquis Stock Exchange Limited.

Countering Financial Crime Letter Explanation

Where a Countering Financial Crime Letter has been requested, this is because Zeta is required to assess your internal controls as part of the onboarding process.

An example of this is a regulated nominee company looking to invest on behalf of its customers. Zeta will not need to conduct any work on those underlying customers (where the nominee company is regulated in an equivalent jurisdiction) as long as Zeta is able to gain comfort that there are sufficient processes in place at the nominee company to onboard those underlying customers.

Under Zeta's regulations, the letter must contain information to assure Zeta as to:

- The entity's risk-grading procedures, including the ability to differentiate between the onboarding requirements for high-risk and low-risk customers; and
- The entity's application of appropriate and effective due diligence measures in respect of its customers, including enhanced measures for PEPs and other high risk relationships.

In addition, Zeta may request information to assure Zeta as to:

- The entity's ongoing monitoring of the customers;
- The entity's use of sanctions and adverse media screening;
- The entity's training of its staff;
- The entity's processes as to reporting of suspicions;
- The entity's application of source of wealth and source of funds controls;
- The entity's acceptance of so-called 'shell banks' as customers; and
- The entity's application of a compliance monitoring programme to monitor their ongoing compliance with their local regulations.

Zeta has produced a templated Countering Financial Crime Letter that is available on request.