

What information and documents are required to onboard clients (physical persons): reminders, complex situations, mistakes.

- > Account opening request, identification of the contracting party and of the UBO (CDB forms 2020), KYC
- > Complex situations: multiple nationalities / domiciles, dates of birth, dubious identity documents
- > Common errors: utility bills, unacceptable identity documents

SPEAKER

Olivier Maes,

Executive Director, GRC, Head Regulatory Compliance and Financial Crime, Forvis Mazars, Switzerland and Liechtenstein

Introduction

- The client is required to provide certain documents and information for identification, verification of identity, and due diligence (KYC).
- This includes official documents (identity documents, corporate documents, notarized deeds for fund origin, etc.) and non-official documents (business cards, private contracts, professional and personal background information, etc.).
- But before anything else: Who is the client? Is he the contractual party or the beneficial owner?

REMINDER OF INFORMATION AND DOCUMENTS TO BE OBTAINED

Account opening request: what information to collect? Mistakes to be avoided

- Recording required data for verifying the contractual counterparty's identity
- Personal data required for individuals: name, first name, date of birth, place of birth, nationality(ies), actual residential address
 - Reminder: Is recording a single nationality sufficient? What about dual nationalities?
 - Required data for legal entities: company name, domiciliary company vs. operational company, actual registered office address
 - Type of identity document received / Number / Place of issuance (valid ID)
 - Mode of dispatch/communication (email, mail, retained mail)
 - Frequency of communication for statements
 - Correspondence/communication address
 - Mention of attached documents (General Conditions, other documents)
 - Other details (e.g., current account currencies, reference currency, etc.)
 - Date / Individual signature?

Identification of the contracting party: Which documents to obtain from the client? Mistakes to be avoided

- For an individual: A valid identity document of the counterparty
- For a legal entity's counterparty: Extract from the commercial register / other recognized document / corporate documents
- For a trust: obtain the identity of the trustee (he is the account holder (CDB))
- Power of representation for legal entities: Extract from the commercial register or board of directors' decision?
- Focus: 1) Identity document; 2) Commercial register extract
- Online extract from the commercial or companies register?

Identification of the Beneficial Owner (UBO): How to fill out the CDB 2020 Forms?

- **Controlling party:** What is a controlling party in relation to a BO?
 - Requirement for an identity document copy (ID)? What is the practice?
 - Required data to record: name, first name, actual residential address
- **Beneficial owner:**
 - Requirement for an ID copy? Requirement for identification and verification of the beneficial owner. Required data: name, first name, date of birth, nationality, actual residential address, and country of residence. What if the BO only has a «care of» address? Or no tax residence?
 - Trust settlor/Founder/Beneficiaries: similar data required as for beneficial owners.

The KYC Document / Client Profile: what information and documents to request from the client?

- Who is the client? Where is the client? Where does the client conduct their professional activities?
- Purpose of the account: Why does the client want to open an account with the financial intermediary? Wealth management account or transactional banking?
- What is the client's personal and family situation?
- What is their current and recent professional situation? What about their financial situation? What is the origin of their wealth and its evolution? And what is the origin of the funds involved in the business relationship?
- Asset composition vs. total wealth?
- Actual domicile, tax residence, or absence of an actual domicile: what should be done?
- Expected wealth and anticipated transactions: why?
- Political status or exposure: PEP or associated with a PEP?
- Purpose of using a domiciliary company within a complex structure?

Tax documentation

Compliance with reporting obligations (CRS/FATCA), status concerning CRS – beware of pitfalls related to client declarations without verification by the financial intermediary.

Sanctions

- How and where to gather the necessary information to assess the client's exposure to international sanctions? Should annual reports be requested, social media reviewed, or web searches conducted? How to react if no information on the client is found through search engines?
- How to analyze the geographical dispersion of clients concerning sanctions and their activities?

COMPLEX SITUATIONS, COMMON ERRORS

Complexity when

- The client has multiple nationalities – What should be done?
- The client has multiple residences or domiciles – Does this impact KYC or rather cross-border activities?
- The client has different birth dates appearing on identity documents – Is this possible or a forgery?
- Identity documents appear to be falsified – How to verify passport authenticity?
- The account undergoes changes in beneficial owners.

Reminder of certain aspects or concepts that are often misunderstood or imprecise

- Origin of wealth vs. origin of funds
- Definition of PEP by association
- Should identity documents of individuals be automatically renewed?
- Should the address recorded on the BO's Form A also be verified?
- For address verification, should client utility bills (e.g., water, gas, electricity), and tax statements be obtained?

Common errors in various cases

- Common mistakes when the client claims his wealth originates from an inheritance
- The client has taken a significant stake in a company, financing this investment partly with his wealth and partly with a loan; what is the KYC mistake?
- Errors in corroborating the client's source of wealth and source of funds
- Beneficial owner or nominee?
- Which types of identity documents are not acceptable?
- Utility bills: which should be considered?
- Does the company still exist?

What information and documents are required to onboard clients (physical persons)

PRACTICAL INFORMATION

Venue
Zurich Sheraton Hotel
Pfungstweidstrasse 100, 8005 Zurich

Visio conference on Zoom
The Zoom link and the documentation will be sent to the participants on 31 March in the afternoon. Academy & Finance provides technical assistance during the conference.

How to register
by phone: +41 (0) 22 849 01 11
by fax: +41 (0) 22 849 01 10
by e-mail: info@academyfinance.ch
by post: Academy & Finance SA
3 rue Neuve-du-Molard, CH-1204 Geneva
www.academyfinance.ch

Fees
620 CHF (+ VAT 8.1%)
Additional registrations from the same company: - 50%

Registration and payment
Payment is made by bank transfer or by credit card. Credit card payments will be debited immediately upon receipt of card details. In any case, we will send you an invoice by email.

Substitution & cancellation policy
Substitutions from the same company are accepted at any time. Cancellation requests must be received in writing, by fax or by post up to the following dates end of business :

- 25 March refund of 90%
- after 25 March no refund will be made for cancellation.

REGISTRATION FORM

I register for the seminar "What information and documents are required to onboard clients (physical persons)" on 1st April 2025.

I will attend in the conference room I will attend online on Zoom

FIRST PARTICIPANT

Full name.....

Position.....

E-mail.....

SECOND PARTICIPANT (-50%)

Full name.....

Position.....

E-mail.....

Company.....

Address.....

Postcode..... City.....

Tel Mobile.....

Person to which the invoice must be sent for payment:

Name..... Email.....

Bank transfer Mastercard VISA

Credit card No : ____/____/____/____ Expiry date : ____/____

Cardholder.....

Date Signature.....