

Client and Account Due Diligence

Anti-Money Laundering

IronBright Investment Management Limited are required to comply with responsibilities in relation to Customer Due Diligence. This includes; client identity, checking the source of wealth for investments and monitoring suspicious activities on the platform.

An essential part of the process of Customer Due Diligence is accurate identification of our clients, as defined in our Platform Terms & Conditions. Your Financial Adviser has a similar responsibility and will have carried out its own verification process when you became a client.

In order to achieve the Anti Money Laundering regulation requirements, IronBright Investment Management will outsource verification checks to your Financial Advisory firm. These checks will be full identification verification as well as Politically Exposed Persons (PEP) and Sanction list checks.

Your Financial Adviser will use online services, such as GBG Global and EIDV; which are systems that have been developed to ensure anti-money laundering compliance and meet the required standards for electronic identity verification as per the Joint Money Laundering Steering Group. In particular, they allow us to identify clients who are not physically present and avoid the necessity for clients to provide their official identity documents for verification.

The systems check databases to confirm the following information in order to complete a full verification;

- Title
- Surname
- First-Name
- Middle-Name
- Place of Birth
- DOB
- Years at current address
- Previous address
- Home phone number
- Electoral Roll
- Passport reference number
- Driving license reference number
- Driving license issue date
- Driving license microfiche number
- PEP List search
- Government Sanctions List Search

To ensure the advisory firms are meeting their responsibility, and our outsourced responsibility, for conducting full online verification; IronBright Investment Management will contact the advisory firms on an annual basis to request identification verification for a random selection of the clients held on the platform. All evidence in support of these checks, including further investigation where a PEP or Sanction marker appear, must be valid, in-date and provided within 14 days of the request. Documentation will subsequently be held securely by IronBright Investment Management.

Suspicious Activity

Along with verifying your identity, we have systems in place on the platform to highlight any suspicious activity. Where we receive such notifications, we will contact your Financial Adviser and ask for evidence to confirm any changes or requests made are genuine. Any evidence collected will be held securely by IronBright Investment Management.

We have a responsibility to ensure we know the source of funds for our clients. We reserve the right to contact your Financial Advisor where we see unusual activity on an account, which may look like money being invested and withdrawn close together. We may also request information about the source of funds particularly where investments are of a higher value.

We understand any information we collect about you, from your Financial Adviser, is private and confidential and we take the security of your personal information seriously. IronBright Investment Management Limited are registered with the Information Commissioners Office under registration number ZA188173 and must abide by the data protection regulations in keeping your information secure.

