



GROWTH  
INVEST

Due Diligence:  
Source of  
Funds &  
Wealth

Version Date: 06/01/2026



## Introduction

This document is intended to provide more information around the possible Source of Wealth and Source of Funds information and documentation which may be required as part of our due diligence, or enhanced due diligence, processes.

## Source of Funds

SOURCE OF FUNDS	IDENTIFICATION: DETAILS REQUIRED	VERIFICATION: EVIDENCE REQUIRED
<b>Receipt of funds from a Third Party Deposit</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>Relationship of third party to the Customer</li> <li>Purpose for the third party payment</li> <li>Jurisdiction of the third party and</li> <li>Details on how the payment will be made including routing of payment</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>Invoice / receipts</li> <li>Evidence of relationship between third party and the Customer and verification of third party</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>Details of the originating institution such as cheque or wire transfer</li> </ul>
<b>Receipt of funds from a Third Party and is a Cross Border payment (Originating from overseas)</b>	<ul style="list-style-type: none"> <li>Jurisdiction of the remitter</li> <li>Jurisdiction of the remitting institution</li> <li>Rationale of payment</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>Details on how will the payment be made including routing of payment</li> </ul>	<ul style="list-style-type: none"> <li>Evidence of relationship between third party and the remitter and verification of third party</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>Details of the originating institution such as cheque or wire transfer</li> </ul>
<b>Transfer of assets</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>Market value</li> <li>Transferring broker</li> <li>Account number/reference</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>Date of transfer</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>Closing statement</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>Letter confirming transfer from previous investment firm</li> </ul>
<b>Receipt of funds from own funds</b>	<ul style="list-style-type: none"> <li>Bank Statement – showing level of funds that are to be deposited</li> </ul>	<ul style="list-style-type: none"> <li>Bank Statement – showing level of funds that are to be deposited</li> </ul>

## Source of Wealth

SOURCE OF FUNDS	IDENTIFICATION: DETAILS REQUIRED	VERIFICATION: EVIDENCE REQUIRED
<b>Savings – personal / non-employment</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Name of institution where savings account is held</li> <li>• Value of savings held and</li> <li>• Date the account was opened</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Evidence of account opening e.g. first statement or account opening confirmation from institution where the account is held</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Most recent savings statement</li> </ul>
<b>Savings - from employment income</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Salary per annum including bonus</li> <li>• Employer's name and address and</li> <li>• Nature of employer's business.</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Payslip dated within the last three months</li> <li>• Bank statement showing receipt of the last three months' salary payments from employer</li> <li>• Letter from employer confirming salary and bonuses on company letter-headed paper</li> <li>• Signed letter from regulated accountant confirming origin of income source</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Last accounts for self-employed individuals</li> </ul>
<b>Savings - Divorce settlement</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Date received</li> <li>• Total amount received and</li> <li>• Name of divorced partner</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Copy of court order</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Solicitor's letter on letter-headed paper</li> </ul>
<b>Sale of property</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Sale value of property sold</li> <li>• Address of property sold</li> <li>• Date of original purchase and</li> <li>• Date of sale</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Signed letter from Solicitor engaged for the sale</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Completed sale contract for the property sold</li> </ul>
<b>Sale of property - Company sale or sale of interest held in a company</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Name &amp; address of company sold/sale of interest</li> <li>• Total sale price of company sold/sale of interest</li> <li>• % of share sold by the Customer</li> <li>• Nature of business of the company and</li> <li>• Date of sale</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Signed letter from Solicitor engaged for the sale</li> <li>• Signed letter from UK regulated accountant</li> </ul> <p>Or</p> <ul style="list-style-type: none"> <li>• Copy of the contract of sale and evidence of investment monies on a Bank statement</li> </ul>

## Source of Wealth (continued)

SOURCE OF FUNDS	IDENTIFICATION: DETAILS REQUIRED	VERIFICATION: EVIDENCE REQUIRED
<b>Company profits</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Name and address of Company</li> <li>• Incorporation certificate</li> <li>• Nature of Company's business and</li> <li>• Amount of annual profits</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Copy of latest published Firm accounts</li> <li>• Confirmation of the nature of business activity and turnover, detailed in a letter from a licensed accountant</li> </ul>
<b>Sale of stock market investments</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Description of shares sold</li> <li>• Value of shares sold</li> <li>• Name and address of stockbroker/bank whom the sale was transacted through</li> <li>• Date of original purchase; and date of sale</li> </ul>	<p>The following must be obtained:</p> <ul style="list-style-type: none"> <li>• Certificates, contract notes or surrender statements</li> <li>• Bank statement clearly showing receipt of funds and investment company name</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Signed letter detailing funds from a regulated accountant on letter headed paper</li> </ul>
<b>Bequest – Inheritance</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Name of benefactor and relationship to Customer</li> <li>• Date of death</li> <li>• Date inheritance funds received and</li> <li>• Total amount received</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Grant of Probate (with a copy of the will) which must include the value of the estate</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Signed letter from solicitor involved or estate trustees on company letterhead</li> </ul>
<b>Bequest – Gift</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Total amount received</li> <li>• Date of gift</li> <li>• Purpose of gift</li> <li>• Name of donor and relationship to Customer</li> <li>• Donor's source of wealth and</li> <li>• Source of donated funds</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• The SOW of the benefactor must be verified so the benefactor needs to provide documentary evidence as set out in this table, depending on the source of the SOW specified</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Letter from donor explaining the reason for the gift and the source of the donor's wealth</li> </ul>
<b>Trust assets</b>	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• Name and address of Trust</li> <li>• Trust deed</li> <li>• Nature of Trust and</li> <li>• Trust assets</li> <li>• Registration with Trust registration service</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>• Confirmation of Trusts assets from official trust documents, so dependent on type of trust; copy of will or Grant of Probate, copy of trust deed, or copy of trust bank account statement</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>• Signed letter confirming trust assets from solicitor or accountant involved on company letterhead</li> </ul>

## Source of Wealth (continued)

SOURCE OF FUNDS	IDENTIFICATION: DETAILS REQUIRED	VERIFICATION: EVIDENCE REQUIRED
Assets of estate of a deceased person	<ul style="list-style-type: none"> <li>The following must be recorded:</li> <li>Name of benefactor and relationship to Customer</li> <li>Date of death</li> <li>Date inheritance funds received</li> <li>and</li> <li>Total amount received</li> </ul>	<ul style="list-style-type: none"> <li>One of the following must be obtained:</li> <li>Grant of Probate (with a copy of the will) which must include the value of the estate, or Confirmation of Trusts assets from official trust documents</li> <li>Confirmation of APS transfer supported by a closing statement or letter confirming transfer from previous investment firm</li> <li>Signed letter from solicitor involved or estate trustees on company letterhead</li> </ul>
Pension fund	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>Date of retirement</li> </ul>	<p>The following must be obtained:</p> <ul style="list-style-type: none"> <li>Most recent pension statement</li> <li>Details of employment or previous employment</li> <li>Name of address of employer or previous employer and, if relevant, amount of pension income</li> <li>Letter from Annuity provider</li> <li>Signed letter from regulated accountant</li> <li>Bank statement showing receipt of the latest pension income and name of provider</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>Most recent savings statement.</li> </ul>
Other - Employer paying a premium	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>Employer letter</li> <li>Country of incorporation and</li> <li>Incorporation number</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>Employer letter (confirming what will be paid, that the Customer is an employee, and a brief explanation as to why the employer is paying the premium)</li> <li>Certificate of Incorporation</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>Copy of latest audited Firm accounts</li> </ul>
Other - Loan	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>Amount of loan</li> <li>Purpose of loan</li> <li>Name and address of loan provider and</li> <li>Date of loan</li> </ul>	<p>One of the following must be obtained:</p> <ul style="list-style-type: none"> <li>Loan agreement</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>Recent loan statements</li> </ul>
Other – sources of income not already covered	<p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>Nature of income</li> <li>Amount of income</li> <li>Date income received</li> <li>and</li> <li>Details of whom the income as received from</li> </ul>	<p>The following must be obtained:</p> <ul style="list-style-type: none"> <li>Signed letter from regulated accountant confirming origin of income source</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>Other appropriate documentation (see Compliance for further guidance)</li> </ul>



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