

COMPLIANCE CHECKLIST

#	Requirement	Details
1	Ownership Chart	<p>Required if the ownership structure includes more than two (2) layers.</p> <ol style="list-style-type: none"> 1. Submit a complete and clear Ownership Chart reflecting all ownership layers up to the Ultimate Beneficial Owner (UBO). 2. Must at least include entity names, jurisdictions, registration numbers, and ownership percentages. 3. Chart must be dated and signed in original ink or with an approved digital signature by the Manager / Director. 4. Signature should original and clear. Scanned or photo-captured signatures are not accepted. 5. Chart must align with the UBO Declaration Form. <p>Note: The Customer Service team shall conduct an initial and quick review of the Ownership Chart to ensure all required elements are provided and the format is complete. However, the final verification of jurisdictions, registration numbers, and ownership accuracy shall remain the responsibility of the Compliance Department</p>
2	Source of Funds / Source of Wealth	<p>Corporate Entities:</p> <ol style="list-style-type: none"> 1. Provide Audited Financial Statements (AFS) for the latest fiscal year, issued and signed by a locally licensed auditor and stamped with the audit firm's seal. <p>If the company is newly established or the corporate shareholder/parent company is a foreign entity, acceptance of foreign AFS shall depend on Compliance recommendation based on the jurisdiction.</p> <p>Natural Persons:</p> <ol style="list-style-type: none"> 1. Submit bank statements for the last three (3) months from a UAE-based bank, showing the account holder's name, account number, and transaction history. If the new investor is not a UAE resident and has no local bank account, submission of foreign bank statements is acceptable. 2. Financial data must be authentic, unaltered, and traceable till the Source of Wealth (SOW) / Source of Funds (SOF) are identified to declared business activities. <p>Note:</p> <ol style="list-style-type: none"> 1. The Customer Service is not required to review individual transactions in the statements; however, the data must clearly support the declared business activity and source of capital. 2. The Customer Service team shall conduct an initial and quick review of the Audited Financial Statements (AFS) and bank statements to ensure all required elements are provided, the documents are in the correct format, legible, and properly signed or stamped. However, the final verification of financial authenticity, jurisdictional adequacy, and traceability of Source of Funds (SOF) / Source of Wealth (SOW) shall remain the responsibility of the Compliance Department.
3	Constitutional Documents (All Ownership Layers)	<p>Provide valid constitutional or corporate documents for each layer of ownership, including but not limited to:</p> <ul style="list-style-type: none"> – Trade License / Commercial Register – Memorandum & Articles of Association (MOA/AOA) – Share Certificates / Register of Members – Certificate of Incumbency / Good Standing – Latest amendments to MOA or AOA <p>At least one document per layer must clearly prove ownership linkage / matching the related parties (including complex structures).</p> <p>For foreign documents:</p> <ol style="list-style-type: none"> I. Must show shareholders and ownership percentages. II. Must be translated into English or Arabic by a certified translator. III. Must be attested and legalized by the relevant authorities abroad and by the UAE Ministry of Foreign Affairs (MOFA). IV. All documents must be current (not older than 12 months) and fully legible. <p>Note:</p> <ol style="list-style-type: none"> 1. In complex ownership structures, the Customer Service team shall review only the key pages demonstrating ownership and signatory authority, while the Compliance Department shall conduct the detailed verification of all constitutional documents. 2. If the client has previously submitted attested documents and no ownership changes have occurred, re-attestation is not required until the existing MOFA attestation expires. 3. The Customer Service team shall conduct an initial and quick review of the constitutional documents to ensure completeness, correct format, translation, and legibility. However, the final verification of ownership linkage, shareholder details, and attestation validity shall remain the responsibility of the Compliance Department

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		<p>Submit valid, color copies of non-expired identification for all relevant individuals, including Ultimate Beneficial Owners (UBOs), Managers, Directors, and Shareholders.</p> <p>Accepted identification documents include:</p> <ul style="list-style-type: none"> – Passport (photo and signature pages) – Emirates ID (front and back) <p>All identification documents must be uploaded in high resolution to the CRM member profile.</p> <p>Expired IDs must be replaced before submission; otherwise, processing will be deferred.</p> <p>Note:</p> <ol style="list-style-type: none"> 1. If an ID renewal is under processing, the EIDA renewal form shall be accepted temporarily until the new Emirates ID is issued. 2. The Customer Service team shall conduct an initial and quick review to confirm that all required identification documents are submitted, valid, and legible. However, the final verification of identity validity and authenticity shall remain the responsibility of the Compliance Department.
<p>UBO and CDD form</p> <p>(The UBO and CDD forms are being merged into one consolidated form. All fields marked with an asterisk (*) are mandatory; mark "N/A" only when not</p>		
4	Customer Due Diligence (CDD)	<p>Company:</p> <p>The Company CDD Form must be fully completed, present-dated (within the last 30 days), and signed in ink or via an approved digital signature by the Registered Member (Manager / Director).</p> <p>Handwritten changes must be initialed and dated.</p> <p>If signed by another individual, a notarized Power of Attorney (POA) granting signature authority must be attached.</p> <p>For Question 9 (UBO disclosure), the UBO must be a natural person. If the UBO is an entity, it must be either a publicly listed company or wholly owned by a government entity. The entity name and jurisdiction must be clearly stated.</p> <p>Individual:</p> <p>The Individual CDD Form must be fully completed, dated within 30 days, and signed in ink or via approved digital signature by the Registered Member (Manager / Director).</p> <p>Scanned or mobile-captured signatures are not accepted.</p> <p>If signed by a representative, a notarized and attested POA must be attached.</p> <p>The form may be signed by the Manager / Director on behalf of the UBO.</p> <p>Note: The Customer Service team shall conduct an initial review and quick of the CDD section to ensure they are complete, properly dated, and duly signed. However, the final verification of UBO identification, completeness of disclosures, and signature validity shall remain the responsibility of the Compliance Department.</p>
5	UBO Declaration Form	<p>The form must be fully completed, presently dated, and signed in original ink or via an approved digital signature by the Registered Member (Manager / Director).</p> <p>Section B:</p> <p>List all corporate ownership layers, including:</p> <ul style="list-style-type: none"> – Entity names – Registration numbers – Jurisdictions – Ownership percentages <p>Section C:</p> <p>Complete this section for each natural person UBO and duplicate the section as needed.</p> <p>If the UBO is a stock-listed or wholly government-owned entity, declare this clearly in Section B or Section C, as applicable.</p> <p>All information in the UBO Declaration must match the Ownership Chart and CDD Form exactly. Any inconsistencies will result in the file being returned for correction.</p> <p>Note: The Customer Service team shall ensure that all UBO declaration sections are properly filled, signed, and consistent with the ownership chart. However, the final verification of ownership structure, completeness, and accuracy of UBO details shall remain the responsibility of the Compliance Department.</p>