

Declaration of compliance

Institution details

Financial Institution name			
Location		Name of Compliance Officer/MLRO	

1. We confirm that we comply with the local laws regulating our activities.
2. We confirm that our customer due diligence procedures comply with local regulations.
3. We consent to you relying on our responsibility to perform these procedures.
4. We confirm that we have not been fined or sanctioned and are not being investigated by any relevant Authorities. We undertake to disclose this to you if this status changes.
5. We confirm that we do not participate in or facilitate transactions that we suspect being linked to money laundering, terrorism financing, in breach of an embargo or in breach with the applicable regulation.
6. We confirm that we are not aware of any conflict of interest that we have with Ashburton at the date of this assurance.
7. We confirm that the clients for which we act as intermediary/introducer have an established relationship with us.
8. We confirm that we will inform the clients for which we act as intermediary/introducer of our relationship with you.
9. We understand that you reserve the right not to open any account or to close any account (with notice) at your full discretion.
10. We confirm that we have identified and verified the identity of the underlying/introduced clients (and any beneficial owners and controllers) and recorded the evidence of identity according to procedures established and maintained by us.
11. We confirm that the information provided accurately reflects the clients' due diligence information that we hold.
12. We confirm that we have established and do maintain records of all transactions between ourselves and the underlying/ introduced clients for at least 5 years after the termination of the relationship with the customer.
13. We confirm that we will inform you immediately should we become aware of any activities, by any of our clients we introduce to you, which lead us to suspect that the client is involved in criminal or terrorist activity and/or money laundering (subject to the tipping off provision).
14. We confirm that we do not maintain any anonymous accounts, or accounts in fictitious names.
15. We confirm that we hold the necessary authority from the clients for disclosure and execution of any transactions initiated by us with you.
16. We agree that you reserve the right to make specific enquiries where the nature or size of a transaction is regarded by you as being unusual in relation to the business usually transacted between us.
17. Where we introduce a client to you and the account is opened in the name of the client, we understand that you reserve the right, upon request to ourselves, to meet with the clients before or at any time after the establishment of the relationship with you and undertake to facilitate this.
18. We undertake to inform you without delay if we have not fully verified the identities of clients in line with the regulatory requirements applicable to us.
19. In case any of the underlying/introduced clients are assessed at any time by either ourselves or yourselves as a Politically Exposed Person, linked to a high risk sensitive country or risk sensitive activity or, in case of a company, having bearer shares in circulation or any other factor which would qualify the underlying/introduced clients as high risk, we confirm that we will provide you with full due diligence (identification and verification of identity of the underlying/introduced clients).
20. We agree to provide relevant clients' due diligence information and copies of documentation establishing evidence of identity of the underlying/introduced clients (and any beneficial owners and controllers) upon request and without delay, within at least 5 business days.



21. Should we terminate our relationship with the introduced clients we confirm that we will inform you of such event and that we will provide you with the full due diligence (identification and verification of identity) documentation.
22. If we at any time are no longer able to comply with any of the aforementioned because of a change in legislation, or in our terms of business, we agree to notify you that we are no longer able to comply, and to provide you with such due diligence on the underlying/introduced clients as required.
23. We confirm that any element of procedures of Ashburton (such as the lists of sensitive jurisdictions, or the definition and classification of PEPs) which has been communicated to us will be considered by us as strictly confidential, and will not be passed on to any third party, without the express consent of Ashburton (Jersey) Limited or under the compulsion of Law.
24. We agree to notify you of any change in the client due diligence (CDD) information provided to you in relation to ourselves that we believe in good faith could impact your risk assessment of ourselves (such as change of controllers and beneficial owners).
25. We agree to notify you of any change in the CDD information provided to you in relation to the underlying/introduced clients that we believe in good faith could impact your risk assessment of them (such as change of activity/occupation, source of funds/wealth, controllers and beneficial owners).
26. We agree to provide you with any update of the CDD documentation sent to you in relation to ourselves or the underlying/introduced clients.

Signature and declaration

By signing this document you are confirming to Ashburton that you perform financial services business in accordance with the standards expected by your local regulator as a Reliable Introducer of business.

Name		Position	
Signature		Date	

Contact details

Please return to JTC Fund Solutions (Jersey) Limited as Administrator of the funds, as below:

Postal address

(To be used when returning application forms or general correspondence).

Ashburton Investments,
PO Box 13422,
Dunmow, CM7 0PY

Registered address

(To be used when returning original or certified documents via courier).

Corporate Mailing Solutions Limited,
Unit 4B, Chelmsford Road Ind. Estate,
Great Dunmow, Essex, CM6 1HD