

### **About Orega**

At Orega we offer services such as providing registered office addresses, business addresses, and mail forwarding for our clients. Due to this, Orega is classed as a Trust and Company Service Provider (TCSP) and as a TCSP, we are supervised by HMRC therefore Orega must abide by rules and regulations set by both HMRC and Trading Standards. The Regulations are designed to prevent money laundering, terrorist financing, fraud and other financial crimes.

### **Why This Matters**

As a TCSP, we must abide by The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. Within the regulations are strict customer due diligence (CDD) requirements that Orega must follow.

CDD procedures are designed to identify and mitigate the risk that our services are not used for illegal activities. Additionally, by following these procedures we are able to demonstrate our compliance under the relevant regulations to the HMRC, Trading Standards and other authorities.

Equally, we are in partnership with building owners who operate multi tenanted buildings and we consider it critical for the safety and security of ourselves, their tenants, and our occupier clients that we are confident that we know who our clients are and what they do.

We have listed below the CDD requirements according to the regulations.

### **Customer Due Diligence (CDD) Procedure**

#### **Customer Risk Assessment**

Before and during our relationship with a customer, we conduct a risk assessment which establishes the level of CDD that is required for all customers, especially those using virtual office services. This means we must gather and verify specific information to ensure the legitimacy of the customer and their activities.

#### **Who do we need to identify/verify**

- Identify and verify the legal owner of the company.
- Identify and verify the ultimate beneficial owners (those who ultimately control the company).
- Identify and verify who is on the Board or in senior management.
- Know what the company does and where it is registered.

As part of the process, we check the details we have been provided in respect of the company and its officers against the databases of government and credit agencies and similar regulatory organisations using a compliance platform called Northrow.

#### **How do we verify the identity of key individuals/organisations?**

- Obtain the company name and company registration number as displayed on companies house.
- Identify the individuals we are dealing with, their positions, and the company they represent. On occasions it is required, we will request a company structure chart to verify the company's hierarchy.
- For Individuals, this may include verifying the full name, date of birth and residential address of the following people:
  - The beneficial owners
  - The directors
  - Any shareholders with 25% or more shares
  - Any people with significant control (PSC)

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Below you will find the list of acceptable government issued documents that can be used for identification purposes and acceptable forms of proof of address. The identification documents should display the person's full name, photo with a date of birth. Proof of address must display your name, address and be dated within the last 3 months. Please note a single document cannot be used as both proof of ID and proof of address.

### **Proof of Identity**

- Current signed passport.
- Original birth certificate (UK birth certificate issued within 12 months of the date of birth in full form including those issued by UK authorities overseas such as Embassies High Commissions and HM Forces).
- EEA member state identity card (which can also be used as evidence of address if it carries this).
- Current UK or EEA photocard driving license/ full old-style driving license.
- Photographic registration cards for self-employed individuals in the construction industry – CIS4.
- Benefit book or original notification letter from Benefits Agency.
- Firearms or shotgun certificate.
- Residence permit issued by the Home Office to EEA nationals on sight of own country passport.
- National identity card bearing a photograph of the applicant.

### **Proof of Address**

- Utility bill (gas, electric, satellite television, landline phone bill) issued within the last three months.
- Local authority council tax bill for the current council tax year.
- Current UK driving licence (but only if not used for the name evidence).
- Bank, Building Society or Credit Union statement or passbook dated within the last three months.
- Original mortgage statement from a recognised lender issued for the last full year.
- Solicitors letter within the last three months confirming recent house purchase or land registry confirmation of address.
- Council or housing association rent card or tenancy agreement for the current year.
- Benefit book or original notification letter from Benefits Agency (but not if used as proof of name).
- HMRC self-assessment letters or tax demand dated within the current financial year.
- Electoral Register entry NHS Medical card or letter of confirmation from GP's practice of registration with the surgery.

Please note that the information we require is no more onerous than the information that would need to be provided to an accountant, lawyer or bank if they were to establish a new service.

In summary, as a TCSP we must conduct these due diligence measures in accordance with current UK compliance laws and this will always depend on the two factors: the type of license and level of service requested.