

KINGSWOOD

Foreign Account — Enhanced Due Diligence (EDD) Checklist

Kingswood AML Program. Reviewed and approved by AML Compliance, then submitted to Operations for processing. Complete for any foreign / non-resident account or where a foreign EDD trigger applies.

Account Name	Account Number
Registration Type	Country of Domicile
RR Name / Rep #	Introduced / Referred By
Business Line	Custodian / Product Sponsor

Step 1 — Identify applicable EDD trigger(s) (check all that apply)

Non-resident alien / foreign individual
Foreign entity (corporation, trust, partnership)
Account domiciled in a high-risk / FATF-listed / inadequately-regulated jurisdiction
Numbered account or account requesting confidential handling
Foreign public official / senior foreign political figure (incl. immediate family & close associates) — PROHIBITED (see Section D)
Correspondent account for a foreign financial institution
Private banking account (non-U.S. beneficial owner)

A — Customer Identification (all foreign accounts)

Full legal name captured
Date of birth (individuals)
Physical address — residential/business (individual) or principal place of business (entity)
Non-U.S. person ID number: U.S. TIN, OR passport no. + country of issuance, OR alien ID card no., OR other unexpired gov't-issued document bearing a photo/safeguard and evidencing nationality/residence
Unexpired government-issued photo ID obtained, recorded, and copy retained — must be seen by the opening employee (not taken over the phone)
Non-documentary verification completed where the customer is not present in person, ID is unavailable/unfamiliar, or the account is opened without documents (direct contact, consumer-reporting/database, references from another FI, or financial statement)
Entity documents obtained at account opening — trust instrument / certified articles of incorporation / partnership agreement / government business license
Appropriate IRS W-8 obtained in lieu of W-9 — W-8BEN (individual) / W-8BEN-E (entity); W-8ECI / W-8EXP / W-8IMY as applicable
Foreign Person With U.S. Indicia form obtained where a U.S. address or phone is present
Customer notice of identity verification provided

B — AMLCO pre-approval & additional verification (numbered, confidential, high-risk-country)

Account referred to and approved by the AML Compliance Officer prior to opening
Minimum TWO forms of customer identification obtained
Any additional identification information required by the AMLCO obtained

C — Sanctions / government-list screening

Customer and account screened against OFAC lists (SDN and all published lists) at account opening
Account's home country screened against OFAC / FATF high-risk & non-cooperative jurisdiction lists
If a match: account blocked, clearing firm notified, open orders cancelled, and OFAC notified within 10 days
Customer information compared against applicable government lists

D — Senior Foreign Political Figure / Foreign Public Official

PROHIBITED — Kingswood does not open or maintain accounts for senior foreign political figures or foreign public officials, including their immediate family members and close associates. If a customer or beneficial owner is identified as a senior foreign political figure or foreign public official, do not open the account — escalate to the AML Compliance Officer.

E — Correspondent accounts for foreign financial institutions

Account referred to the AMLCO at opening

Risk assessment performed — nature of the FI's business & markets; type/purpose/anticipated activity; nature & duration of the relationship; AML/supervisory regime of the home jurisdiction; known AML record

Foreign Bank Certification obtained — confirms not a shell bank; identifies owners and a U.S. agent for service of process; 3-year re-certification scheduled

Confirmed the institution is NOT an unregulated foreign shell bank (prohibited; a regulated affiliate is permitted)

Enhanced DD applied where the bank operates under an offshore license, in a non-cooperative jurisdiction, or under §311 special measures — identify owners (if not publicly traded), obtain AML-program info, payable-through / nested-correspondent info

§311 special-measures obligations checked and applied (prohibitions / notifications), if designated

Risk-based ongoing monitoring & periodic review established

F — Private banking accounts

Identity of all nominal and beneficial owners determined

Purpose and expected use of the account determined

Determination whether any beneficial owner is a senior foreign political figure or foreign public official — if yes, prohibited (see Section D)

Source(s) of funds deposited determined

Account activity reviewed for consistency; ongoing due diligence maintained (no reliance on foreign institutions)

G — Shell company / entity transparency

Underlying / beneficial-owner information obtained where the customer is a shell company, PIC, LLC, or trust with no operating business

Accounts and owners screened against OFAC restrictions

Assurances obtained from the entity representative that principals have been screened

H — Recordkeeping & ongoing monitoring

All identifying information, documentary/non-documentary verification, approvals, discrepancy resolutions, and AMLCO referrals retained in the account file (retain 5 years after the account closes)

Ongoing monitoring method established for accounts approved with conditions (duplicate statements / periodic activity review)

Notes

Disposition (completed by AML Compliance; on approval, submit to Operations for processing)

Approved Escalated Rejected

AML Compliance Officer — reviewed & approved

Signature / print:

Date: