

Cranfords  
Office 12  
Venture Wales Building  
Pentrebach  
Merthyr Tydfill  
CF48 4DR

Date: 12 April 2023  
Letter Ref: /04297337  
Our Ref: VAN444  
Direct Dial: 0203 975 0308

Dear Sir/Madam

**Vanguard Investment UK Limited**

**Clients' names: Cranfords, Mr Ian Lazenby and  
Protect My Universe Ltd**

**Account number: 2371**

Further to our letter of 4 April 2023, we have now concluded our investigations into your complaint concerning the delay in receiving the proceeds. I am sorry you had reason to complain.

We appreciate that only one signature could be provided on behalf of Protect My Universe Ltd and we have updated the account to reflect that the renunciation form has been received and accepted. However, in order to release the proceeds, we still require Anti-Money Laundering verification documents for Cranfords. A letter was sent to you on 14 March 2023 to request these but we have not received a reply. I have enclosed our corporate guidelines along with a pre paid envelope for your convenience.

We hope that we have resolved your complaint to your satisfaction. However should you remain unhappy with this response, please do not hesitate to contact us on the above telephone number and we would be happy to clarify any matters of concern.

In addition, and in accordance with our complaints procedures, should you remain dissatisfied, you have the right to refer your complaint to The Financial Ombudsman Service, but you must do so within six months of the date of this letter.

I have enclosed a leaflet that explains how you can take your complaint to the Ombudsman at the following address: -

The Financial Ombudsman Service  
Exchange Tower  
Harbour Exchange  
London  
E14 9SR  
Tel: 0800 023 4567

Yours faithfully



**Alexandra Zarrop**  
**Client Service Recovery Officer**

Enclosure(s):    Financial Ombudsman Service Leaflet  
                         ML Docs Corporate Guide  
                         AML Assurance Letter  
                         Trust Details form  
                         AML Doc Slip  
                         BO & Controller Details  
                         BO & Controller Guidelines  
                         Pre paid envelope

## **DOCUMENTATION GUIDELINES FOR CORPORATE ENTITIES**

Please provide certified copies of the documents shown below. Do not send originals of documents.

For UK/EU/EEA regulated companies, copies must be certified and dated by an authorised signatory or company secretary within the firm. For all other entities, copies must be certified and dated by an independent professional or regulated person subject to the anti-money laundering regulations and include the signature, name and position of the person signing. The certification must be dated within the last 6 months.

### **Listed Public Company**

We require:

- ☐ Confirmation of Stock Exchange Listing
- ☐ Completed Wolfsberg Questionnaire dated within the last 12 months, where this is applicable
- ☐ Up-to-date Authorised Signatories list

### **UK/EU/EEA Regulated Firm**

We require:

- ☐ Confirmation of regulator and reference number
- ☐ Completed Wolfsberg Questionnaire dated within the last 12 months
- ☐ Full List of Directors, Shareholders, Beneficial Owner(s) and Person(s) of Significant Control (PSC); including full name, residential address and date of birth of each individual – please note we may attempt electronic verification checks and request verification documents where required. See Beneficial Owner and Controller Guidelines for more information
- ☐ Up-to-date structure chart, including ownership percentages
- ☐ Up-to-date Authorised Signatories list

### **Non-UK/EU/EEA Regulated Firm**

We require:

- ☐ Confirmation of regulator and reference number
- ☐ Completed Wolfsberg Questionnaire dated within the last 12 months
- ☐ Certificate of Incorporation (or equivalent)
- ☐ Memorandum and Articles of Association (or equivalent)
- ☐ Full List of Directors, Shareholders, Beneficial Owner(s) and Person(s) of Significant Control (PSC); including full name, residential address and date of birth of each individual – please note we may attempt electronic verification checks and request verification documents where required. See Beneficial Owner and Controller Guidelines for more information
- ☐ Up-to-date structure chart, including ownership percentages
- ☐ Up-to-date Authorised Signatories list

### **Nominee owned by a Regulated Firm**

We require:

- ☐ Confirmation of regulated parent (please complete enclosed Letter of Assurance)
- ☐ Completed Wolfsberg Questionnaire dated within the last 12 months
- ☐ Full List of Directors, Shareholders, Beneficial Owner(s) and Person(s) of Significant Control (PSC); including full name, residential address and date of



birth of each individual – please note we may attempt electronic verification checks and request verification documents where required. See Beneficial Owner and Controller Guidelines for more information

- ☐ Up-to-date structure chart, including ownership percentages
- ☐ Up-to-date Authorised Signatories list

### **Nominee owned by a Non-regulated Firm**

We require:

- ☐ Certificate of Incorporation (or equivalent)
- ☐ Memorandum and Articles of Association (or equivalent)
- ☐ Confirmation of Senior Manager(s) responsible for operations
- ☐ Full List of Directors, Shareholders, Beneficial Owner(s) and Person(s) of Significant Control (PSC); including full name, residential address and date of birth of each individual – please note we may attempt electronic verification checks and request verification documents where required. See Beneficial Owner and Controller Guidelines for more information
- ☐ Up-to-date structure chart, including ownership percentages
- ☐ Up-to-date Authorised Signatories list

### **Private Corporate Company**

We require:

- ☐ Certificate of Incorporation (or equivalent)
- ☐ Memorandum and Articles of Association (or equivalent)
- ☐ Confirmation of Senior Manager(s) responsible for operations
- ☐ Full List of Directors, Shareholders, Beneficial Owner(s) and Person(s) of Significant Control (PSC); including full name, residential address and date of birth of each individual – please note we may attempt electronic verification checks and request verification documents where required. See Beneficial Owner and Controller Guidelines for more information
- ☐ Up-to-date structure chart, including ownership percentages
- ☐ Up-to-date Authorised Signatories list

### **Incorporated Registered Charity**

We require:

- ☐ Confirmation of the Charity's registration with relevant Charity Commission, including associated reference number
- ☐ Certificate of Incorporation (or equivalent)
- ☐ Memorandum and Articles of Association (or equivalent)
- ☐ Confirmation of Senior Manager(s) responsible for operations
- ☐ Full details of Directors/Trustee(s) and Person(s) of Significant Control; including full name, residential address and date of birth of each individual – please note we may attempt electronic verification checks and request verification documents where required. See Beneficial Owner and Controller Guidelines for more information
- ☐ Full details of the class of Beneficiaries
- ☐ Excerpt of the Trust Register to evidence relevant registration (available from 2020)
- ☐ Up-to-date Authorised Signatories list (if a Corporate Trustee or Director is appointed)

### **Unincorporated Registered Charity**

Please note this will be registered in the name(s) of the Trustee(s), who will be verified in their own right.

We require:

- ☐ Confirmation of the Charity's registration with relevant Charity Commission, including associated reference number
- ☐ Extract of Trust Deed or latest Deed of Appointment/Retirement, or alternative documents establishing the Charity's legal status
- ☐ Full details of all Trustees; including full name, residential address and date of birth of each individual – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Full details of the class of Beneficiaries
- ☐ Excerpt of the Trust Register to evidence relevant registration (available from 2020)
- ☐ Up-to-date Authorised Signatories list (if a Corporate Trustee or Director is appointed)

### **Regulated or Registered Occupational Pension Scheme**

Please note this will be registered in the name(s) of the Trustee(s), which will be verified in their own right.

We require:

- ☐ Full registered name and address of the Pension Scheme
- ☐ Full details of the Pension Administrator, including full registered name, address and regulatory reference/Companies House number – please note we may attempt electronic verification checks and request verification documents where required
- ☐ Where applicable, full details of the Corporate Trustee(s), including full registered name(s), address(es) and regulatory reference number(s) – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Where applicable, full details of the Individual Trustee(s), including full name, residential address and date of birth of each individual – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Excerpt of the Trust Register to evidence relevant registration (available from 2020)
- ☐ Confirmation of company (employer) name and registered address
- ☐ Evidence of HMRC or Pension Regulator registration, including PSTR reference, or Pension Scheme Incorporation Documents and Trust Deed (or latest Deed of Amendment)
- ☐ Up-to-date Authorised Signatories list

### **Regulated or Registered Personal Pension Scheme**

Please note this will be registered in the name(s) of the Trustee(s), which will be verified in their own right.

We require:

- ☐ Full registered name and address of the Pension Scheme
- ☐ Full details of the Pension Administrator, including full registered name, address and regulatory reference/Companies House number – please note we may attempt electronic verification checks and may also request verification documents where required



- ☐ Where applicable, full details of the Corporate Trustee(s), including full registered name(s), address(es) and regulatory reference number(s) – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Where applicable, full details of the Individual Trustee(s), including full name, residential address and date of birth of each individual – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Full details of the Pension's Beneficiary, including full name, residential address and date of birth – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Excerpt of the Trust Register to evidence relevant registration (available from 2020)
- ☐ Evidence of HMRC or Pension Regulator registration, including PSTR reference, or Pension Scheme Incorporation Documents and Trust Deed (or latest Deed of Amendment)
- ☐ Up-to-date Authorised Signatories list

### **Small Self-Administered Scheme (SSAS)**

Please note this will be registered in the name(s) of the Trustee(s), who will be verified in their own right.

We require:

- ☐ Full registered name and address of the Pension Scheme
- ☐ Full details of each Trustee, including full name, residential address and date of birth of each individual – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Full details of the Pension's Beneficiary, including full name, residential address and date of birth – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Excerpt of the Trust Register to evidence relevant registration (available from 2020)
- ☐ Confirmation of company (employer) name and registered address
- ☐ Evidence of HMRC or Pension Regulator registration, including PSTR reference, or Pension Scheme Incorporation Documents and Trust Deed (or latest Deed of Amendment)
- ☐ Up-to-date Authorised Signatories list

### **Trust**

Please note this will be registered in the name(s) of the Trustee(s), who will be verified in their own right. We require:

- ☐ Full details of each Trustee, Settlor, Beneficiary, Protector and Controller (if applicable); including full name, residential address and date of birth of each individual – please note we will attempt electronic verification checks and may also request verification documents where required. We have provided a form in which these details can be provided
- ☐ Extract of Trust Deed which details the nature and purpose of the Trust and country of establishment and all Beneficial Owners detailed above (or latest Deed of Amendment)
- ☐ Excerpt of the Trust Register to evidence relevant registration (available from 2020)
- ☐ Up-to-date Authorised Signatories list for the Trustee (if a Corporate Trustee is appointed)

**Partnerships/Other Unincorporated Business**

Please note this will be registered in the name(s) of the Partner(s), who will be verified in their own right.

We require:

- ☐ Full details of each Partner/Business Owner; including full name, residential address and date of birth of each individual – please note we will attempt electronic verification checks and may also request verification documents where required
- ☐ Partnership Agreement
- ☐ Up-to-date Authorised Signatories list

**All Other Corporate Entities not listed above**

We require:

- ☐ Any incorporation/registration documents pertaining to the entity
- ☐ Full details of all Beneficial Owners; including full name, residential address and date of birth of each individual – please note we may attempt electronic verification checks and request verification documents where required
- ☐ Up-to-date Authorised Signatories list

## Letter of Assurance Guidelines

Under UK Money Laundering Regulations we may be able to apply a simplified level of due diligence where certain requirements are met, such as dealing with a regulated entity.

Your organisation does not appear to be regulated, therefore please either:

1. Complete the enclosed form confirming the UK / EU / EEA regulated entity you are governed by and supply an organisation chart to enable us to apply simplified due diligence, or
2. If you are not governed by a UK / EU / EEA regulated entity, please provide supporting documentation that can be used to satisfy our anti-money laundering requirements. We may contact you for further information.

Please note that until we receive this information we will withhold any applicable repurchase proceeds. There may also be a delay in the acceptance of any further funds until our requirements have been satisfied.



Client Name:
Client Number / UH ID / Reference:

## Letter of Assurance

Full name of nominee / wholly owned subsidiary:

.....

Registered Address of firm:

.....

Full name of **regulated parent**:

.....

Full address of **regulated parent**:

.....

Regulators name (e.g. UK - FCA):

.....

Regulators Reference Number:

.....

Please ensure this form is signed by a Director or the MLRO of the parent company if in the UK, or an equivalent person if outside of the UK. By signing this you are confirming that the above nominee / unregulated subsidiary firm is governed by your organisation for anti-money laundering purposes and subject to your policies and procedures. Also, that it is the subject of regular reviews and audits confirming that they apply anti-money laundering standards equivalent to the Joint Money Laundering Steering Group (in the UK) and / or 4<sup>th</sup> EU Anti-Money Laundering Directive, as amended from time to time, or equivalent legislation.

**Completed By:**

**Signed:** ..... **Name (PRINT):** .....

**Date:** ..... **Position (PRINT):** .....

## TRUST DETAILS

For applicants acting as Trustee(s) (or similar), please provide details of all Settlers (even if deceased), any further Trustees or others (including Protectors) that have any control over the management of the trust or arrangement, and any named individuals or classes that have a potential entitlement to 25% or more of the property of the trust assets (even where discretion exists).

Name of account holder(s) :		Client reference (if known)					
Title & Full Name	Permanent Residential Address	Date of Birth	Capacity (tick as applicable)* :				
			Trustee	Settlor	Beneficiary	Protector	Controller

*\*If the capacity of an individual has not been provided, please write clearly what capacity they hold within the organisation.*

If there are more individuals then please provide their details on a separate sheet of paper and enclose with this form. Please note that all of the details requested above will need to be stated clearly for each individual. Please also be aware that we will require an original or correctly certified copy of an Extract of the Trust Deed to complete our checks.

## Declaration

All individuals named on this form are known to me/us and I/we undertake to make those named above aware that they may be subjected to the same data protection and money laundering verification provisions as outlined in the terms and conditions.

Applicant's Signature	_____	Applicant's Signature	_____
Date	_____	Date	_____



## AML Documentation Slip

Please return this page with your documentation.

Client Reference: 0000002371

Client name: CRANFORDS

Client address: Office 12  
Venture Wales Building  
Pentrebach  
Merthyr Tydfil

If certified, please arrange for the certifier to provide the following details:	
Certifier name:	
Signature:	
Job title:	
Date:	
Business telephone number:	
Business address:	

## **Beneficial Owner and Controller Details (Individuals)**

Name of account holder(s)

Client reference (if known)

Name & Title:

Date of birth:

Capacity/ies\*:

%


Name & Title:

Date of birth:

Capacity/ies\*:

%


Permanent Residential Address:

Permanent Residential Address:

\* e.g. Beneficiary, Partner, Shareholder, Director, PSC etc

Name & Title:

Date of birth:

Capacity/ies\*:

%


Name & Title:

Date of birth:

Capacity/ies\*:

%


Permanent Residential Address:

Permanent Residential Address:

\* e.g. Beneficiary, Partner, Shareholder, Director, PSC etc

Please provide any additional information on a separate page.

### Declaration

All beneficial owners and other associated parties are known to me/us and I/we undertake to make those named above aware that they may be subjected to the same data protection and money laundering verification provisions as outlined in the terms and conditions.

Applicant's Signature

Date

.....

Applicant's Signature

Date

.....

## Beneficial Owner and Controller Details (Corporate Entities)

Name of account holder(s)

Client reference (if known)

Corporate name:

Capacity/ies\*:

Corporate name:

Capacity/ies\*:

Business Address:

Business Address:

\* e.g. Corporate Trustee, Director, etc

Corporate name:

Capacity/ies\*:

Corporate name:

Capacity/ies\*:

Business Address:

Business Address:

\* e.g. Corporate Trustee, Director, etc

Please provide any additional information on a separate page.

### Declaration

All beneficial owners and other associated parties are known to me/us and I/we undertake to make those named above aware that they may be subjected to the same data protection and money laundering verification provisions as outlined in the terms and conditions.

Applicant's Signature

Date

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Applicant's Signature

Date

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## **BENEFICIAL OWNER AND CONTROLLER GUIDELINES**

In the case of a body corporate, other than a company listed on a regulated market, the beneficial owner includes any individual who:

- exercises ultimate control over the management of the body corporate; or
- ultimately owns or controls (whether through direct or indirect ownership or control, including through bearer share holdings or by other means) more than 25% of the shares or voting rights in the body corporate; or
- otherwise controls the body corporate

For example, if no individual owns or controls more than 25% of the shares or voting rights in the body, firms should use judgement in determining whether an individual owning or controlling a lower percentage exercises effective control.

Guidance on the meaning of other forms of significant influence and control is available for companies: [www.gov.uk/government/news/people-with-significant-control-psc-who-controls-your-company](http://www.gov.uk/government/news/people-with-significant-control-psc-who-controls-your-company)

For applicants who are body corporates or partnerships please provide details below of any natural person(s) that directly own or control more than 25% of the voting rights in the body or partnership or who own or are entitled to more than 25% of its capital or profits.

Should the applicant not be directly owned by a natural person(s), please send details of the ownership structure to us and upon receipt we will advise you of any further information that may be required from you.

Information provided will be validated accordingly and we may be required to obtain further details or documentation from you, depending on the information provided.