



Mortgage Intermediary Due Diligence Questionnaire

Contact Name

Company Name

Contact Address

Telephone Number

Email Address

All parties should complete Parts 1-6 of this questionnaire, sign the declaration and return to Skipton International Limited along with certified copies of the documentation set out in the Documentation section of this questionnaire.

Please make every attempt to answer the questions fully. Where Skipton has asked for details of directors and beneficial owners, this is because it has a regulatory obligation to understand who it is doing business with. If the intermediary firm is unwilling to provide these details, Skipton will not be able to enter into a business relationship with the intermediary firm.

Useful terms

CDD	Customer Due Diligence
Customer	An individual or legal entity that is using the services of the intermediary firm
DMLRO	Deputy Money Laundering Reporting Officer
ECDD	Enhanced Customer Due Diligence
ML	Money Laundering
MLRO	Money Laundering Reporting Officer
PEP	Politically Exposed Person
PF	Proliferation Financing
Sanctions nexus	A natural person or legal person who is the subject of international sanctions, or any party that is linked to such a person
SOF	Source of Funds
SOW	Source of Wealth
TF	Terrorist Financing

PART 1 - The Business of the Intermediary Firm

Section 1 – The Intermediary Firm

Please provide the following details in the box below:

- The full legal name of the company;
- An official identification number such as a company registry number;
- The legal form and law to which the company is subject;
- The date and country of incorporation of the company;
- The registered office address of the company and, if different, the address of its principal place of business.
- All trading names of the company.

Please describe the nature of the intermediary firm's business and its business strategy. Where are its key markets and activities, and what are its products/services and growth plans?

Please describe the anticipated volume and value of mortgages the intermediary firm wishes to refer to Skipton.

Please describe the intermediary firm's principal sources of new business.

If the intermediary firm is part of a larger financial services group, please provide a brief overview of the group, including its size, the location of its head office, the countries in which it does business, and the products and services it offers.

Please specify the number of employees and partners/directors (i.e. members of the board of directors or equivalent) within your intermediary firm.

Please provide the full names, all nationalities, the country of residence and the date and place of birth of the partners and/or directors of the intermediary firm.

Please provide the full names, all nationalities, the country of residence and the date and place of birth of the natural person beneficial owners¹ of the intermediary firm.

Have there been any material changes to the ownership structure or strategy of the intermediary firm in the last three years? If yes, please provide details and the rationale for the changes.

Section 2 – The Intermediary Firm’s Regulatory Status

For UK intermediaries that are part of a mortgage network, please answer the following questions from the perspective of the network. For all other intermediaries, please answer these questions from your own perspective.

What regulatory licence(s), if any, does the intermediary firm hold, which regulatory body issued the licence(s) and when was the date of issue?

Is the intermediary firm required to comply with any national framework in respect of countering ML/TF/PF? If so, please provide high-level details of the framework in place. If the intermediary firm is not required to comply with any national framework, please answer this question “N/A”.

Is the intermediary firm supervised for compliance with any national framework in respect of countering ML/TF/PF? If so, please provide details of the supervising body and how it carries out that supervision (e.g. on-site visits, thematic reviews, questionnaires, etc.). If the intermediary firm is not supervised for compliance with any national framework, please answer this question “N/A”.

¹Any individual with a more than 25% shareholding in the intermediary firm, or more than 25% of voting rights in the intermediary firm, irrespective of whether the holding is direct or indirect (i.e. through another entity).

When was the date of the last assessment of the intermediary by a regulator or supervisory body? Please indicate the name of the regulatory/supervisory body and nature of the assessment e.g. governance/ financial crime/mortgage broking/thematic etc. and advise whether the intermediary firm was required to put any form of risk mitigation plan or remediation in place. If the intermediary firm has not had an assessment by a regulatory or supervisory body in the past five years, or is not regulated or supervised for any aspect of its business, please answer this question “N/A”.

Are there any outstanding financial crime prevention, mortgage broking or governance findings related to any assessment by a regulator or supervisory body or any internal/external audit assessment? If yes, please provide details including the nature of the findings, the date of the findings and the expected time-scale for remediation. If the intermediary firm has not had any form of assessment in the past five years, or is not regulated/supervised, please answer this question “N/A”.

Has the intermediary firm or any other firm within its group of companies ever been sanctioned by a regulator or supervisory body? If so, please provide details and a link to any public statement made by the regulator/supervisory body. If the intermediary firm is not regulated or supervised, please answer this question “N/A”.

Has the intermediary firm received any significant complaints² in the past five years? If so, please provide details of the nature of the complaint, how it was resolved and what steps the intermediary firm took, if any, to mitigate the risk of the situation happening again.

² A significant complaint is a complaint alleging a breach of any applicable law, mala fides, malpractice, or impropriety, or repetition or recurrence of a matter previously complained of.

PART 2 - The Intermediary Firm's Suitability Measures

Please provide a brief description of how the intermediary firm ensures that a particular mortgage is suitable for the customer.

Given that intermediary firms are paid a commission by Skipton for referring prospective mortgage applicants to the bank, please provide a brief description of how the intermediary firm manages the conflict of interest between receiving a commission from Skipton for a mortgage application and ensuring that a particular mortgage is suitable for the customer.

In assessing suitability, please describe what steps the intermediary firm takes to ensure to the best of its ability that customers are not engaged in mortgage fraud.

PART 3 - The Intermediary Firm's Customer Due Diligence Measures

Section 1 – New customers

Does the intermediary firm have a Risk and Compliance Function or is part of a mortgage network that provides a Risk and Compliance function? If so, please provide details of the structure and governance surrounding the Risk and Compliance function(s); including names of the MLRO/DMLRO. If the intermediary firm does not have a Risk and Compliance function, please answer this question "N/A".

Please provide a brief description of the nature of the customer due diligence the intermediary firm undertakes on a prospective new customer.

Where a prospective new customer is a legal person³ rather than an individual, please provide a brief description of the methodology the intermediary firm uses to identify all beneficial owners, controllers and ultimate economic owners of a prospective customer who is a legal person.

In establishing the natural person beneficial owners of a prospective customer that is a legal person, what % of shares or voting rights does the firm apply to define a beneficial owner? If a lower threshold is used for high-risk customers such as PEPs please explain and specify the threshold.

³ Legal persons include companies, foundations, partnerships and any other customer that is not a natural person.

Please explain what measures you take to understand the precise nature of any business undertaken by prospective customers who are not natural persons.

Please explain what measures you take to ensure that you have identified the true settlor(s) of any trust that is a source of wealth or source of funds for a customer.

Please describe how the intermediary firm differentiates high risk prospective customers from standard, medium and/or low risk customers.

Please explain the nature of the enhanced due diligence carried out on those categories of prospective customers, beneficial owners and other key principals that you have reason to believe pose a heightened risk of ML/TF/PF. If you apply different ECDD for different types of risk customer (e.g. PEPs) please explain.

Please explain what measures you take to ensure that any prospective customer, beneficial owner or underlying principal who is or becomes a PEP or a PEP by association is identified as such.

Does the intermediary firm undertake any screening of prospective customers for a sanctions nexus and for negative news?⁴ If yes, please briefly describe the arrangements and the process for evaluating any hits.

Please provide the intermediary firm's definition of source of wealth. Please describe its arrangements for obtaining source of wealth information from prospective customers, including any customer segments for whom you obtain additional documentary evidence of SOW.

Please provide the intermediary firm's definition of source of funds. Please describe its arrangements for obtaining source of funds information from prospective customers, including any customer segments, or transaction types for which additional documentary evidence on SOF is obtained.

⁴ Skipton defines negative news as (i) identification of an individual as a PEP or PEP by association or (ii) identification of potential involvement of an individual in criminal activity, including money laundering, terrorist financing or proliferation financing, or (iii) identification of a potential reputational issue regarding an individual.

Does the intermediary firm have arrangements in place to identify any suspicious activity in respect of ML/TF/PF and report to law enforcement authorities where necessary? If so, please provide a brief description below. If there is no requirement to do so in the jurisdiction in which the intermediary firm is based, please answer this question "N/A".

Section 2 – Existing customers

Once a successful mortgage application to Skipton has been accepted and the mortgage loan completed, does the intermediary firm have any arrangements in place to monitor the customer on an ongoing basis, or does it consider the customer relationship to have ended at this point?

If the intermediary firm does not consider a customer relationship to have ceased at the point a mortgage loan is completed, does the intermediary firm have arrangements in place to monitor existing customers? If so, please provide a brief description below of the arrangements in place, including any screening for negative news, a PEP connection or a sanctions nexus.

PART 4 - Payment Route for Commission Payments

For payment of any commission arising from successful completion of a mortgage, please indicate how the intermediary firm wishes to be paid:

Pay firm direct

Pay firm via mortgage network or club

Where payment will be made to a mortgage network or club, please provide the following details below:

- Indicate whether the entity is a mortgage network (i.e. FCA authorised) or a mortgage club;
- The full legal name and all trading names of the network or club;
- The address of the network or club;

PART 5 - Additional Information

Is there any further information that you wish to provide in respect of the areas covered by this questionnaire? If so, please do so in the box below.

PART 6 - Documentation Checklist

For GFSC licensed mortgage intermediaries

No documentation required.

For FCA authorised mortgage intermediaries

Please tick to confirm that certified copies⁵ of the following documents have been provided to accompany this completed questionnaire.

Document	Attached	Document	Attached
Structure chart(s) detailing ownership and operational management of the intermediary firm ⁶ .		The Register of Directors for the intermediary firm	

For all other firms (including Appointed Representatives of FCA authorised mortgage intermediaries)

Please tick to confirm that certified copies⁷ of the following documents have been provided to accompany this completed questionnaire.

Document	Attached	Document	Attached
Structure chart(s) detailing ownership and operational management of the intermediary firm ⁸ .		The Register of Shareholders for the intermediary firm	
The Register of Directors for the intermediary firm			

⁵ These documents should be certified by a director, company secretary or senior manager of the intermediary firm and should bear the following certification wording "*I certify that this is a true copy of the original document which I have seen.*" The certification should also bear the certifier's full name, their professional position or capacity, the date of certification and at least one method of contact such as an address, phone number or email address.

⁶ The structure chart should include (i) the full names of all legal person/arrangement and natural person holders of shares or voting rights in the intermediary firm, regardless of their holding, and (ii) the % of the respective holding(s) for each legal person/arrangement and each natural person.

⁷ These documents should be certified by a director, company secretary or senior manager of the intermediary firm and should bear the following certification wording "*I certify that this is a true copy of the original document which I have seen.*" The certification should also bear the certifier's full name, their professional position or capacity, the date of certification and at least one method of contact such as an address, phone number or email address.

⁸ The structure chart should include (i) the full names of all legal person/arrangement and natural person holders of shares or voting rights in the intermediary firm, regardless of their holding, and (ii) the % of the respective holding(s) for each legal person/arrangement and each natural person.

Declaration

We confirm that the information contained in this questionnaire is complete, accurate and current. We undertake to advise Skipton immediately if there are material changes to its content, or to the directors or natural person beneficial owners of the intermediary firm.

Authorised Signatory:

Date:

Authorised Signatory:

Date:

YOUR HOME MAY BE REPOSSESSED IF YOU DO NOT KEEP UP REPAYMENTS ON YOUR MORTGAGE. Skipton International Ltd is licensed under the Lending, Credit and Finance (Bailiwick of Guernsey) Law 2022. All mortgages are subject to status and valuation. To help maintain service and quality, telephone calls may be recorded.