

SWIFT KYC PROCESS

List of documents Detailed guidance and requirements

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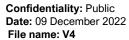
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1 Introduction

Purpose of the document	The purpose of this document is to provide detailed information on the KYC documents that must be submitted to SWIFT by an applicant during the onboarding process and/or by an existing SWIFT user when reporting a change, with a view to increase the acceptance rate and reduce the processing timeline.
Intended audience	This document is for the following audience: - Applicant users that are going through the onboarding process to join SWIFT as a SWIFT user - Existing SWIFT users that need to provide KYC documents in the scope of change of category or transfer of BICs
Additional documents	SWIFT reserves the right to request additional documents in the scope of its Know Your Customer validation process. The applicant shall also provide additional documents conditional to the SWIFT user categories in which an applicant wishes to join. Those ones are clearly identified in this document.
Legal background - SWIFT Corporate rules	SWIFT may request the applicant or SWIFT user to provide it with any material documentation to substantiate the applicant's or SWIFT user's compliance with the eligibility criteria and conditions for admission.
Rejection of application/Supension/Termination	Failure to provide the documents in a timely manner or insufficient evidence of its compliance with the eligibility criteria and conditions for admission may be a cause for rejection of an application file or a ground for SWIFT to stop the admission process, reject the application or suspend or terminate a SWIFT user.
Disclaimer	SWIFT reserves the right to reject an application or suspend or terminate a usership based on the analysis of the documentation provided.
Related documentation	SWIFT Bylaws SWIFT Corporate Rules SWIFT Personal Data Protection Policy





2 Important notes

SWIFT is a cooperative and provides its products and services on a common basis to its Community. Therefore, SWIFT's KYC and due diligence process is common and neutral, and all requirements apply to all (applicant) SWIFT users and are not negotiable. You can find here a summary description of SWIFT's "Know Your Customer" validation process for the admission of new SWIFT users and continued compliance of existing users with the corporate rules.

To avoid those unnecessary iterations and rework, which has an impact on the full processing timeline, we have listed below some important notes to ensure the documents provided are as expected and required.

SWIFT User Category	As a condition precedent to using SWIFT's messaging services, an organisation must be registered as an authorised SWIFT user under one of the SWIFT user categories. SWIFT has defined a number of SWIFT user categories as set out in section 2.2 of the SWIFT Corporate Rules. An organisation must be registered in the SWIFT User category that corresponds to its status (supervised or not), its business activities and future use of the messaging services.
Company name	Documents must be issued at the name of the legal entity that is applying as a new SWIFT User or to which the change applies. If it relates to another legal entity or if the company legal name is not properly indicated, SWIFT will not accept it. Similarly, documents mentioning only a different trade name or commercial names are not acceptable.
Change to Company name	In case the organisation changed name in the past, all the documents related to the change of name must be provided. This includes certificates of name change.
Validity date	If there are requirements on the validity date, those must be met. A document which is expired or about to expire in the near future, will not be accepted. This is particularly valid for extracts from the trade registry but also for copies of passports or identity documents.
Official body	The document must be issued by an authority that is the official authority in the country. Documents issued by commercial databases or chambers of commerce do not qualify.
Completeness	The document must be complete. Documents with missing pages or data will be rejected. It is not acceptable to blacken some parts unless for confidentiality reasons and not essential to our validation process.
Quality	For passport copies, full colour, image mode scan or picture directly taken from the original source document, in pdf or Jpeg, of excellent quality (e.g.400 dpi -about 3300 x 4600 pixels for a full A4 page) will only be accepted.



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	Copies of other documents need to be of good quality. Poor quality copies will not be accepted.
Signature	Where applicable, documents must be signed by an individual having authority to sign on behalf of the legal entity. Signatures must be identical to the ones appearing on the related ID documents. Signatures that are different or not supported by ID documents will be considered as not valid.
Language	Where applicable, a translation in English is required. In case the original documents are not in English and if you have an English version available, please provide both the original and English documents. If you don't have an English version, SWIFT will try to automatically translate the non-English document(s). However translation success depends on the quality and format of the original. Should the automatic translation fail, SWIFT will still request to provide an English translation. Note that a free translation is acceptable; there is no obligation to provide for sworn or certified translation. For lengthy documents such as the Articles of Association, it is acceptable to only translate the most relevant sections of the document such as the articles related to the company name, the term and objective of the organisation.
Recommendation letters	Depending on the category applicable to the (applicant) SWIFT user, there are recommendation letters to be provided. Those ones must be sent by the recommending entity to SWIFT directly. Recommendation letters sent by the (applicant) SWIFT user itself to SWIFT will be rejected.



3 Documents

For each of the document that is or may be requested, detailed guidelines and requirements are given in below subsections. SWIFT will not validate a KYC file until all mandatory documents have been received.

When a document includes any personal data, the <u>SWIFT Personal Data Protection Policy</u> is applicable.

The table below clarifies the sections of the guidelines.

Purpose	Description of the purpose of the document, in other words, what SWIFT wants to check/evidence when requesting this specific document.
Type of document	Official: A document that is issued, electronically through a website or in paper, by the local authorities such as the trade registry or the financial supervisor. Internal: A document that is issued by the organisation itself. When specifically issued for SWIFT purposes, the document must be issued on the company letterhead. SWIFT template: A template document provided by SWIFT.
Issuing body	The body issuing the document. For an official document, it is a local authority such as the trade registry, the state, etc. For the internal document, it is the applicant organisation itself, or its parent or the recommending entity (see 3.10)
Synonym	Depending on the country and market practices, the document may be called differently. In case of doubt, it is useful to carefully read the purpose of the document.
Language requirement	Local language and/or English translation.
Applicability	Mandatory or Optional depending on the user's category but also the type of organisation.
Validity	Requirement relating to the validity or issue date of the document
Alternatives	In some cases, alternative documents can be provided. For example, if the list of Directors is included in another already provided document, there is no need to issue a separate one.
Exceptions	Exceptions are mainly due to: - market practice or local laws - specific customer profiles
Usual contact within your organisation	The department in your organisation that is likely most suited or capable to help in providing this document.



3.1 Extract from the Company/Trade Registry

Purpose	Evidence that the organisation is legally existing and properly registered in the country of the applicant. It usually contains the main information details such as Company name, address(es), Directors, shareholders etc.
Type of document	Official document
Issuance body	Local trade registry
Synonym	Extract of recordsExtract from the commercial registry
Language requirement	Local language + English translation where applicable. Note: Translation can be limited to the sections that are still relevant (outdated information can be ignored)
Applicability	Mandatory
Validity	Less than 3 months old
Alternatives	 Annual return Certificate of good standing Certificate of incorporation (see 0)
Exceptions	It does not apply to companies or institutions set up by law or decree. In such case, the (applicant) SWIFT user shall provide any other document proving its existence such as an extract of the law, charter, partnership agreement etc.
Usual contact within your organisation	Legal department or company secretary



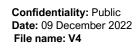
3.2 Certificate of Incorporation

Purpose	Evidence that the organisation has been duly incorporated as a legal entity under the laws of the country
Type of document	Official document
Issuance body	Local trade registry Public notary
Synonym	 Memorandum of Incorporation Charter Notary Deed for creation or modification of a legal entity
Language requirement	Local language + English translation (where applicable). Note: The translation can be limited to the main parts such as the name, date of incorporation
Applicability	Optional - only if the (applicant) SWIFT User cannot provide a full extract from the trade registry (see 0).
Validity	No requirement. The document usually dates back to the date of the incorporation.
Alternatives	Notary deedCertificate of registration (for branches of foreign entities)
Exceptions	Some countries do not issue such document (eg. France, Belgium, Germany). It does not apply to companies or institutions set up by law or decree. In such case, the (applicant) SWIFT User shall provide any other document proving its existence such as an extract of the law, charter, partnership agreement etc.
Usual contact within your organisation	Legal department or company secretary



3.3 Articles of association

Purpose	Document that sets out the entity's name and its purpose. It also includes the responsibilities of the directors and the management as well as the means by which shareholders exercise control over the board of directors and the organisation.
Type of document	Internal document
Issuance body	The organisation itself
Synonym	Memorandum of AssociationBy-lawsCharter
Language requirement	Local language + English translation (where applicable). Note: the translation can be limited to the main parts such as the name, object (purpose) of the company as well as any relevant clauses to meet other requirements (such as evidence of signature for example)
Applicability	Mandatory for all applicant SWIFT Users. Optional for existing SWIFT Users depending on the case. For branches, it will be the Articles of association of the head office company.
Validity	The current version
Alternatives	Partnership agreement for partnerships
Exceptions	Does not apply to companies or institutions set up by law. In this case, the (applicant) SWIFT user shall provide any other document proving its existence such as an extract of the law, charter, partnership agreement etc.
Usual contact within your organisation	Legal department or company secretary





3.4 Group structure

Purpose	 Document showing the current full upward shareholding (legal) structure * of the (applicant) SWIFT User itself up to the ultimate beneficiary owner. It should include: The direct and indirect shareholding ownership, including intermediaries, with the legal names** of the (ultimate) shareholders and intermediaries. Both legal and natural persons (corporates, institutional, governmental or individual) owning and/or controlling directly or indirectly, on an aggregate basis, 10% or more of the entity. Clear percentage of ownership (if ≥ 10%) Date It should be issued on the company letterhead (if internal document) * A list of the names of the subsidiaries and branches (structure
	down) will not be accepted nor will an organisation chart showing only the internal organisation. ** Not only trade names or marks.
Type of document	Internal or official document
Issuance body	The organisation itself or local authority
Synonym	Share registerShareholding structureOwnership structure
Language requirement	English
Applicability	Mandatory unless the information can be found back in another document such as the extract from the trade registry (see 0) or the annual report (see 3.8). For branches, it will be the group structure of the head office.
Validity	The current version
Alternatives	See Applicability
Exceptions	For listed companies with a lot of small shareholders (less than 10%), no further evidence required For supranational / governmental institutions
Usual contact within your organisation	Legal or Finance department

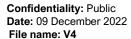


In case this information is not available in another document (see Applicability), please refer to Sample 1 in Annex 2 (see 5.1)

3.5 Composition of the Board of Directors

Purpose	Document showing the full names of the active Directors of the organisation issued on the company letterhead, if internal document.
Type of document	Internal or official document
Issuance body	The organisation itself or local authority
Synonym	Director register
Language requirement	English
Applicability	Mandatory for all applicant SWIFT Users. Optional for existing SWIFT Users depending on the case. Not required if the information can be found back in another document such as the extract from the trade registry (see 0) or the annual report (see 3.8) or even the company website. For branches, it will be the Directors of the head office as well as the branch manager.
Validity	The current information
Alternatives	See Applicability
Exceptions	None, except if the type of company does not require any Directors
Usual contact within your organisation	Legal department

In case this information is not available in another document, please refer to 5.2





3.6 Proof of authorised signatures

Purpose	Proof issued by the (applicant) SWIFT user or its parent organisation confirming that the person that signs the Undertaking or e-order has the power to represent and commit the organisation. Indeed, the Undertaking/e-order being the only contract which is signed, SWIFT must be sure that it is signed by someone having the official (as demonstrated in legal documents) authority to sign.
Type of document	Internal or official document. For passport copies, see 3.7.
Issuance body	The organisation itself or local authority
Synonym	 Power of attorney or local authority Proxy Signatory powers List of authorised signatories
Language requirement	English
Applicability	Mandatory unless the information can be found back in another official document such as the extract from the trade registry (see 0) or a business license.
Validity	The document must still be valid.
Alternatives	See Applicability. An electronic signature is not acceptable.
Exceptions	None
Usual contact within your organisation	Legal department

Additional requirements related the proof of authorised signatures:

- The document must be clear and detailed about the signature authority. A document simply showing the internal organisation will not be accepted.
- The document must be issued and signed by someone authorised to grant such authority and SWIFT should be able to check this against official documents. For example, if the document is signed by a Director, SWIFT should be able to find the name of the Director back in the list of Directors or in any official document such as the extract from the trade registry (see 0). A simple confirmation from the individual signing the Undertaking will be discarded (eg. "I, Mr X, confirm I can sign on behalf of the company"). Self-attestations are not acceptable either.
- If the evidence is a power of attorney,
 - o It must be valid at the time of application. Documents with an expired validity period will be rejected.



- The scope of the power of attorney must be broad enough to cover the operation at stake. For example, if the power of attorney is only related to the signature on bank accounts, SWIFT will reject it.
- The signature policy applicable at the organisation must be complied with. If a joint signature is required, then the documents shall be signed by the individuals duly authorised to sign jointly. If it is not the case, SWIFT will reject the document.

3.7 Passport copies / Official picture IDs

Purpose	Validating the official identity of the concerned person. Evidence that the signatures of the authorised signatories are correct.
Type of document	Official document
Issuance body	Local authorities
Synonym	 Passport Driving license National ID PAN card (for India)
Language requirement	Local language + English translation in case of use of anglicised names (Eg. China)
Applicability	 Mandatory for: the individuals signing the undertaking or the relevant e-order the individuals granting the Power of attorney/authorisation to sign the Security Officers
Validity	The document must still be valid.
Alternatives	Signatures can be legalised by a public notary. In that case, no copy of an ID is required. This alternative is not valid for SWIFT Security Officers, for which a copy of an official ID must be provided.
Exceptions	None
Usual contact within your organisation	The individual him/herself

Additional requirements related the Picture IDs:

- Provide passport copies of the authorised signatories signing the SWIFT Undertaking/e-order
- Provide passport copies of the individuals that granted the Power of Attorney
- Provide passport copies of the SWIFT Security Officers

Passport copies of bad quality will be rejected (cfr Quality requirement in section 2).

In addition, passports and ID documents are stored in a dedicated and secure folder, only accessible by a limited number of staff.



3.8 Audited financial statements including report from the external auditor

Purpose	Analysing the financial soundness of the applicant, based on figures and reports audited by an external auditor.
Type of document	Internal
	Comprehensive report issued by the applicant or the group detailing the financial statements of the previous year to validate financial standing. The document will need to include the auditor's opinion, either within the document or separately.
Issuance body	The organisation itself through their financial auditors
Synonym	 Audited annual accounts
	- Annual report
	 Financial statements
Language requirement	English If the audited financial statements are only issued in local language, the (applicant) SWIFT user shall provide a translation of the audit report into English. No translation of the financial statements themselves is required.
Applicability	Mandatory for all applicant SWIFT Users and existing users in the category "Non-Supervised entities active in the financial industry" For branches, it will be the audited statements of the head office.
Validity	The document must be related to the last available financial year
Alternatives	none
Exceptions (unless applicant in NOSU)	Organisations that were incorporated less than 18 months ago and not having audited financial statements may be requested to provide those documents at a later stage. See below for details.
Usual contact within your organisation	Finance department

Additional requirements related the audited financial statements:

What does SWIFT mean by audited financial statements?

The financial statements must be audited by an external audit firm and according to the International Standards on Auditing (ISA). An audit done by an internal auditor or accountant will not be acceptable.

The audit firm must be recognised locally as a certified auditor. Unless the audit is performed by one of the big 4 audit firms, SWIFT will need to validate that the auditor is duly certified as per the local regulations and registered with an official body/institute of auditors as applicable.



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What if the organisation does not have audited financial statements?

In case the organisation is <u>exempted</u> as per local laws to file audited financial statements, the entity shall then provide:

- Evidence of exemption (statement by an auditor and/or extract of the local law),
 and
- Financial statements including a limited review (ISRE2410 or ISRE2400) done by a chartered accountant, or
- Audited statements of the parent company provided the applicant entity is duly included in the financials and audit. There must be clear evidence that the organisation has been included in the audit. This evidence can be a note in the statements or a confirmation from the audit firm. The fact that the organisation is mentioned in the list of subsidiaries does not represent sufficient evidence.

However, should the organisation apply as a Non-Supervised Entity active in the financial industry (see definition in <u>SWIFT Corporate Rules</u> – Article 2.2.2), then the organisation shall provide audited financial statements as per ISA standards.

In case the organisation is <u>new</u> (defined as incorporated less than 18 months ago) and does not yet have audited financial statements, audited financial statements may be provided at a later stage and as soon as available, except:

- For Corporate Entities owned by a listed company (see definition in <u>SWIFT Corporate Rules</u> Article 2.2.3), the audited statements of the parent company provided the applicant is/will be duly included in the financials and audit. There must be a clear evidence that the organisation has been included in the audit. This evidence can be a note in the statements or a confirmation from the audit firm. The fact that the organisation is mentioned in the list of subsidiaries does not represent sufficient evidence.
- For Non-Supervised Entity active in the financial industry (see definition in <u>SWIFT Corporate Rules</u> Article 2.2.2), ISA audited financial statements need to be provided (covering the period between their incorporation and the date of application). They can provide the audited statements of the parent company providing the auditors confirm that the Non-Supervised Entity is/will be included. See above for details.



3.9 Financial operating license

Purpose	Initial or most recent official document issued by the local financial regulator or supervisory authority authorising the entity to conduct financial business (banking, insurance, securities, etc) and specifying the type of business and activities that the applicant is authorised to conduct.	
Type of document	Official document	
Issuance body	The local supervisor/regulator	
Synonym	Banking licenseOperating permitAuthorisation	
Language requirement	Local language + English translation (where applicable)	
Applicability	Mandatory for supervised financial institutions	
Validity	Must still be valid (especially for operational license issued for a limited period of time)	
Alternatives	None	
Exceptions	Some regulators/supervisors do not issue specific licenses. In this case, a screenshot from the supervisor website will be required.	
Usual contact within your organisation	Regulatory / compliance department / general secretariat	

Additional requirements related the financial operating license:

EU passport

In case the applicant is providing financial services based on an EU passport, SWIFT will check that the competent authorities in the host country has been duly notified.

Even if not required by the supervisor, the applicant shall be established in the country of admission as a legal entity or as a branch.

Offshore or international license

An offshore license or international banking license usually prohibits the holder from establishing any business activities in the jurisdiction of establishment. In case the license is an offshore one, the applicant shall also provide a recommendation letter (see 3.10).

Provisional license

No file will be fully approved until the full license has been granted. While not recommended, the (applicant) SWIFT user is welcome to already launch the process and provide the other documents. However, if these are expired by the time the fully approved license is issued, new, valid documents will have to be re-submitted.

Representative offices

Given that representative offices conduct activities related to representation of the main organisation, an authorisation granted to a representative office will not qualify as operational license.



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Prudential supervision

Only licenses issued by recognised supervisors providing prudential supervision will be considered. Licenses or authorisations issued i.e. solely for Anti-Money Laundering purposes are not acceptable as operational licenses. Please refer to SWIFT Corporate Rules, article 2.2.3.2 for more details.

License issued at a former name

In case the license has been issued to an entity that changed its name in the meantime, the (applicant) SWIFT User shall provide evidence of change of name as well as evidence that the supervisor has been duly informed (cfr. section 3).



3.10 Recommendation letters

Purpose	Confirmation from a recommending entity that it wishes to conduct business with the applicant	
Type of document	SWIFT template document	
Issuance body	The recommending entity	
Synonym	none	
Language requirement	English	
Applicability	 Mandatory for Corporates, unless (owned by) listed company on a FATF stock exchange Non-Supervised Entities active in the financial industry which are not fully owned by a supervised Entity Supervised entities with offshore licenses 	
Validity	Not applicable	
Alternatives	None	
Exceptions	None	
Usual contact within your organisation	Not applicable	

Additional requirements related to recommendation letters:

Common requirements

The recommendation letter must be

- duly signed by the recommending entity
- issued by a recommending entity meeting the specific requirements (see "Issued by" in the below table)
- sent by the recommending entity directly to SWIFT and not via the applicant to SWIFT
- issued by a recommending entity that is not related to the applicant (f.i. it should not be from the same group)
- issued by 3 different entities in the case of Non-Supervised Entities active in the financial industry.

SWIFT reserves the right to contact those recommending entities to get confirmation on the future business relationships with the applicant.



<u>Specific requirements</u> (see <u>SWIFT Corporate Rules</u> for the definitions)

	Recommendation letter for Corporates	Recommendation letter for Non- Supervised Entities	Recommendation letter for Supervised institutions
Applicability	For Corporates not listed or not owned by a listed company, in a FATF country	For all Non-Supervised entities unless majority-owned by a SWIFT user in the supervised financial institution category	For any supervised entity carrying activities with an offshore license
Issued by	A SWIFT user in the category of Supervised Financial Institution, duly registered in SCORE, established in a FATF country and unrelated to the applicant.	A SWIFT user in the category of Supervised Financial Institution, not specifically established in a FATF country and unrelated to the applicant	A SWIFT user in the category of Supervised Financial Institution, established in a FATF country and unrelated to the applicant
Quantity	1	3	1

Specimen

Specimen 1 – Recommendation letter for a Corporate (see 4.1)

Specimen 2 – Recommendation letter for a Non-Supervised entity active in the financial industry (see 4.2)

Specimen 3 – Recommendation letter for a supervised entity (see 4.3)



3.11 Letter of representation

Purpose	Confirmation from the applicant that it meets the requirements of the category in which it applies, confirming its business activities and providing the names and contact details of the organisations with whom it intends to exchange messages.	
Type of document	SWIFT template document	
Issuance body	The applicant	
Synonym	None	
Language requirement	English	
Applicability	Mandatory for Non-Supervised Entities active in the financial industry and Supervised entities upon request from SWIFT	
Validity	Not applicable	
Alternatives	None	
Exceptions	None	
Usual contact within your organisation	Not applicable	

Additional requirements related to letters of representation:

The representation letter must be duly filled in and include:

- A detailed description of the business of the applicant
- A list of at least 3 institutions, SWIFT users, with whom the applicant intends to conduct business, together with a contact name and phone number. It should also specify the types of messages that the applicant intends to exchange. SWIFT reserves the right to contact those entities for more information on the future business relationship.

Specimen

Specimen 4 – Letter of representation for a Non-Supervised Entity active in the financial industry (see 4.4)

Specimen 5 – Letter of representation for a supervised entity (see 4.5)



3.12 Undertaking

Purpose	Contract to be signed by the authorised signatories of an applicant (see 3.6) and confirming that the applicant accepts and abides by the Terms and Conditions and other Contractual Documentation governing its status as SWIFT user.
Type of document	SWIFT template document
Issuance body	The applicant
Synonym	None
Language requirement	English
Applicability	Mandatory for all users' categories
Validity	Not applicable
Alternatives	None
Exceptions	None
Usual contact within your organisation	Not applicable

Additional requirements related to the Undertaking:

The Undertaking is the contract between SWIFT and a customer. It is a prerequisite to join SWIFT. Through this contract, the SWIFT User abides by various terms and conditions including the general terms and conditions but also the SWIFT bylaws and SWIFT Corporate Rules. It must therefore be:

- issued at the legal name of the applicant.
- clean and not contain any major strikethroughs
- duly signed and dated by individuals authorised to sign on behalf of the applicant (see 3.6)
- returned to SWIFT via the onboarding tool but also by courier (for the original, signed copy)

Specimen

Specimen 6 – Undertaking (see 4.6)



3.13 e-order

Purpose	Contract to be signed by the authorised signatories of an existing SWIFT User (see 3.6) and requesting SWIFT to proceed to changes at the level of the current registration details. See below for more information.	
Type of document	SWIFT template electronic document	
Issuance body	The SWIFT User wishing to report changes	
Synonym	None	
Language requirement	English	
Applicability	Mandatory for all users' categories	
Validity	Not applicable	
Alternatives	None	
Exceptions	None	
Usual contact within your organisation	Not applicable	

Several types of e-orders depending on a scenario:

Request a change of name or address only? Then use Scenario 1: Report a change at the level of the name and/or address of the organisation.

This e-order must be used to report that the SWIFT User has changed its legal name or address (ie name and address under which the organisation is registered with the local authorities). Via this form, the SWIFT User will also have the possibility to update the publication data. Not to be used in case the change also impacts the legal entity itself (eg. further to merger).

Request a transfer of a BIC and shares to another SWIFT User for a limited period of time? Then use Scenario 2: Report a name change following a merger with, or transfer to, an existing SWIFT user

This e-order must be used to transfer a BIC, contracts and potential shares to another existing SWIFT User. The form shall be submitted by the current owner of the BIC and contracts while the signed copy will be returned to SWIFT by the acquiring SWIFT user. It is expected that the BIC is transferred for a limited transition period, after which it will be terminated by the acquiring SWIFT user.

Request a transfer of a BIC and shares to a company which is not SWIFT User? Then use Scenario 3: Report a name change following a transfer to a separate legal entity, non SWIFT user

This e-order is typically used to transfer a BIC, potential shares and contracts to another organisation which is not a SWIFT user yet. It is often used when further to restructuring/mergers, the BIC is finally used by another legal entity than the one which is the SWIFT User. The acquiring party will have to go through the usual onboarding process and provide all the documents applicable to applicant SWIFT Users.



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Request a transfer of a BIC and shares to another SWIFT User? Then use Scenario 4: Conversion of a BIC8 to an additional BIC8 of an existing SWIFT user following a merger/acquisition

This e-order is exactly the same as Scenario 2 above except that in this case, the acquiring party wishes to keep this transferred BIC as an additional BIC together with the existing one.

Request a change of legal form only? Then use Scenario 5: Report a change in legal form

This e-order shall be used when reporting a change at the level of the legal form (eg from Ltd to LLC). This change can also be reported via Scenario 1 and this scenario is therefore no longer used.

Request a change of structure (traffic aggregation), with or without transfer of BICs and/or change of name? Then use Scenario 6: Report a change in group structure

This e-order can be used to request changes at the level of the traffic hierarchy (see glossary for definition)

Request a transfer of contracts to an existing SWIFT user? Then use Scenario 7: Transfer of contracts only

This e-order can be used to transfer contracts only

All those e-orders are available on <u>Legal Entity or Publication Change | SWIFT - The global provider of secure financial messaging services</u>



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4 Annex 1

4.1 Specimen 1 – Recommendation letter for a Corporate



Recommendation letter for SCORE

As per the <u>Corporate Rules</u>, to be eligible in the category of *Corporate* and be entitled to use SWIFT services, the corporate entity shall meet specific eligibility criteria. One of those is to be recommended by a SCORE financial institution that is located in a FATF member country and that participates in the SCORE Closed User Group.

There is no liability involved for the recommending financial institution vis-à-vis the other SCORE financial institution or SWIFT.

By completing this letter, a SCORE financial institution recommends a corporate to join the SCORE model and confirms its willingness to exchange traffic with the corporate over SWIFTNet. For the sake of clarity, the SCORE eligibility criteria should not be seen as a substitute for other financial institutions' own AML checks.

To be completed by the recommending SCORE financial institution

Section 1: Financial institution recommending the corporate

Q.1	Name of Financial Institution, recommending the corporate application for SCORE		
Q.2	Bank Identification Code (BIC)		

Section 2: Corporate applying to join SCORE

Q.3	Name of corporate applying to register in SCORE		
Q.4	BIC of corporate (if existing in other user category)		
Q.5	Contact info		
	Name:		
	Title:		
	Telephone:		
	Fax:		
	e-mail:		

¹ As per SCORE eligibility criteria for a recommending SCORE FI, a recommending SCORE FI means a shareholder or its sub-member, participating in the SCORE model, located in a FATF member country.



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Q.6	Registered address		
	Building Name:		
	Street Address:		
	Postal Code/Zip:		
	City:		
	State/County:		
	Country:		
	VAT n°:		

Section 3: Signature

The undersigned declares to have full authority to sign on behalf of the recommending SCORE financial institution. The undersigned further confirms its support for the corporate to join SCORE, and its willingness to exchange traffic with the corporate over SWIFTNet. The undersigned confirms to have reasonable assurance that the corporate complies with the eligibility criteria for corporates as specified in the SWIFT corporate rules.

Q.7	Contact details of authorized signer		
	Title :		
	Name :		
	Function :		
	E- mail address :		
	Office Phone :		
Q.8	Signature		
	Date :		

SWIFT will not make these details available on www.swift.com, and will only use these details to contact you. SWIFT will process any personal data you provide according to the SWIFT Privacy Statement (available at the bottom of all www.swift.com pages).

The authorized signer should e-mail a copy of this completed and $\underline{\text{signed}}$ letter from his/her business e-mail address to $\underline{\text{joining.generic@swift.com}}$.

File name: V4

4.2 Specimen 2 – Recommendation letter for a Non-Supervised entity active in the financial industry



Recommendation letter

for

a Non-Supervised Entity Active in the Financial Industry (NOSU)

By completing this Recommendation Letter, a SWIFT User registered in the SWIFT User category of Supervised Financial Institution hereby recommends a legal entity applying in the SWIFT User category of Non-Supervised Entity Active in the Financial Industry (NOSU). The Supervised Financial Institution does not bear any responsibility or liability towards SWIFT, or the legal entity applying other than it knows the legal entity and confirms its willingness to conduct business, directly or indirectly with the entity over SWIFTNet

To be completed by the recommending Supervised Financial Institution

Section 1: The Supervised Financial Institution that recommends a legal entity applying in the User category of Non-Supervised Entity Active in the Financial Industry

Q.1 Name of the recommending Supervised Financial Institution

Q.2 BIC

Section 2: The legal entity that applies in the SWIFT User category of Non-Supervised Entity Active in the Financial Industry (NOSU)

Q.3	Name of the legal entity that applies in the SWIFT User category of Non-Supervised Entity Active in the Financial Industry (NOSU)			
Q.4	BIC (if known)			
Q.5	Contact info			
	Name:			
	Title:			
	Telephone:			
	Fax:			
	e-mail:			



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Q.6	Registered addres	ss
	Building Name:	
	Street Address:	
	Postal Code/Zip:	
	City:	
	State/County:	
	Country:	
	VAT n°:	

Section 3: Signature of the Supervised Financial Institution

The undersigned declares to have full authority to sign on behalf of the recommending Supervised Financial Institution. The undersigned further confirms that he/she knows the legal entity applying in the SWIFT User category of Non-Supervised Entity Active in the Financial Industry and is willing to conduct business, directly or indirectly with this entity over SWIFTNet. The undersigned confirms to have reasonable assurance that the entity complies with the eligibility criteria for Non-Supervised Financial Institution as specified in the SWIFT corporate rules.

Q.7	Contact details of authorised signer		
	Title : Name :		
	Function : E- mail address : Office Phone :		
Q.8	Signature		
	Date :		

SWIFT will not make these details available on www.swift.com, and will only use them for further processing. SWIFT will process any personal data you provide according to the SWIFT Privacy Statement (available at the bottom of all www.swift.com pages).

Notwithstanding this Recommendation Letter, the applicant SWIFT User in the User category of Non-Supervised Entity Active in the Financial Industry will only be able to use SWIFT services upon it completing the admission process as a SWIFT User, and it being notified by SWIFT that it has been accepted as a SWIFT User.

The authorised signer should send a copy of this completed and <u>signed</u> letter from his/her business e-mail address to <u>joining.generic@swift.com</u>.

File name: V4

4.3 Specimen 3 – Recommendation letter for a supervised entity



Recommendation letter Supervised Financial Institution

By completing this Recommendation Letter, a SWIFT User registered in the SWIFT User category of Supervised Financial Institution and located in a FATF Member country ("Recommending Supervised Financial Institution"), hereby recommends a legal entity ("Applicant Entity") applying in the same SWIFT User category of Supervised Financial Institution"). The Recommending Supervised Financial Institution does not bear any responsibility or liability towards SWIFT, or the Applicant Entity other than it knows the Applicant Entity and confirms its willingness to conduct business, directly or indirectly with the Applicant Entity over SWIFTNet.

To be completed by the Recommending Supervised Financial Institution

Section 1: The Supervised Financial Institution that recommends another legal entity applying in the same category

Q.1	Name of the Recommending Supervised Financial Institution		
Q.2	BIC		

Section 2: The Applicant Entity that applies in the SWIFT User category of Supervised Financial Institution

Q.3	Name of the Applicant Entity		
Q.4	BIC (if known)		
Q.5	Contact info		
	Name:		
	Title:		
	Telephone:		
	Fax:		
	e-mail:		



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Q.6	Registered address
	Building Name:
	Street Address:
	Postal Code/Zip:
	City:
	State/County:
	Country:
	VAT n°:

Section 3: Signature of the Recommending Supervised Financial Institution

The undersigned declares to have full authority to sign on behalf of the Recommending Supervised Financial Institution. The undersigned further confirms that he/she knows the Applicant Entity and is willing to conduct business, directly or indirectly with Applicant Entity over SWIFTNet. The undersigned confirms to have reasonable assurance that the Applicant Entity complies with the eligibility criteria for Supervised Financial Institution as specified in the SWIFT corporate rules.

Q.7	Contact details of authorised signer		
	Title:		
	Name :		
	Function :		
	E- mail address :		
	Office Phone :		
Q.8	Signature		
	Date :		

SWIFT will not make these details available on www.swift.com, and will only use them for further processing. SWIFT will process any personal data you provide according to the https://www.swift.com/privacy-statement.

Notwithstanding this Recommendation Letter, the Applicant Entity will only be able to use SWIFT services upon it completing the admission process as a SWIFT User, and it being notified by SWIFT that it has been accepted as a SWIFT User.

The authorised signer should send a copy of this completed and <u>signed</u> letter from his/her business e-mail address to <u>joining.generic@swift.com</u>.



File name: V4

Specimen 4 – Letter of representation for a Non-4.4 Supervised Entity active in the financial industry

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3	W	1	_

Letter of Representation

				-		e SWIFT User category of industry (NOSU)	
To:	Attn. C Custor Avenu	F.T. SCRL Customer Care mer Operations le Adele 1 0 La Hulpe m	From:	Company: Registered a City: Postal/Zip C County/State Country:	ode:		
ser	vices, th	• • • • • • • • • • • • • • • • • • • •	g duly autho		_	g services and related products ar f of the entity named above (the	nd
1)	describ conclus	ed in Annex A heretosion, we confirm to yo	o) and have ou that:	concluded tha	at we fit w	ty active in the financial industry* (ithin such criteria. In support of su	ich
	ŕ					he main activity of your business)	
		e Company's intende ease describe clearly			ucts and s	ervices is to	
		d we include a list of ssages over SWIFTI		business cou	interpartie	es with who we plan to exchange	
	1. 2. 3. 4. 5.	ounterparties (e.g. E	BIC) & conta	act	Planne	ed transactions, message types	
	c) The	e Company is an ord	anised and	existing legal (entity		

- d) The Company is in good standing financially and with respect to compliance with applicable laws and regulations, and is not
 - i. subject to insolvency, bankruptcy, reorganisation, receivership or similar proceedings and is generally paying its debts and obligations as they become due or
 - subject to any legal proceedings that might reasonably be expected to materially impair its ability to continue its business as currently conducted.



Confidentiality: Public Date: 09 December 2022 File name: V4



e) The Company's books and accounts are regularly audited by an independent audit firm using internationally recognised accounting standards and evidence will be transmitted to SWIFT as part of the on-boarding process

f) We will promptly notify you should any of the matters above no longer be true following the date hereof.



File name: V4

Specimen 5 – Letter of representation for a 4.5 supervised entity



	Letter of Representation supporting the eligibility for becoming a SWIFT user in the SWIFT User category of Supervised financial institution (SUPE)				
	S.W.I.F.T. SCRL Attn. Customer Care Customer Operations Avenue Adele 1 B-1310 La Hulpe Belgium		Company: Registered addr ; Postal/Zip Code County/State: Country:		
servi		ly autho		saging services and related products and behalf of the entity named above (the	
h				nancial Institution® (as described in Annex A n. In support of such conclusion, we confirm	
a	The Company's main activi specify any restrictions to you	-		ribe the main activity of your business and	
b	o) The Company's intended us (please describe clearly, in s			and services is to	
	And we include a list of three messages over SWIFTNet:	e to five	business counter	parties with who we plan to exchange	
	Counterparties (e.g. BIC) 1.	& conta	act P	lanned transactions, message types	
c	c) The Company is an organise	ed and e	existing legal entit	у	

_

- d) The Company is in good standing financially and with respect to compliance with applicable laws and regulations, and is not
 - i. subject to insolvency, bankruptcy, reorganisation, receivership or similar proceedings and is generally paying its debts and obligations as they become due or
 - ii. subject to any legal proceedings that might reasonably be expected to materially impair its ability to continue its business as currently conducted.

S.W.I.F.T. SCRL



Ιf

File name: V4



- The Company's books and accounts are regularly audited by an independent audit firm using internationally recognised accounting standards and evidence will be transmitted to SWIFT as part of the on-boarding process
- f) We will promptly notify you should any of the matters above no longer be true following the date hereof.
- 2) The undersigned, being duly authorised to do so on behalf of the Company:

Title:		Function:	
First:		Business e-mail:	
Middle:		Office phone:	
Last:		Mobile phone:	
different from of	ficial company address above:		
Street:	iciai company address above.		
			-
City:			1
Postal/Zip Cod	de:		1
County/State:			1
Country:			Ĺ
Signature:			Date:

Please return signed to SWIFT together with the requested documents as per the on-boarding process.

Eligibility Criteria Supervised Financial Institution (SUPE)

A Supervised Financial Institution is:

- an entity that engages in payment, securities, banking, financial, insurance, or investment services or activities, and that, for such purposes
 - a. is (i) licensed by or (ii) authorised by or (iii) registered with a Financial Market Regulator, and
 - b. is subject to supervision by a Financial Market Regulator as per below definition
- an international, supranational, intergovernmental or national governmental body or institution that
 as a main activity engages in payment, securities, banking, financial, insurance, or investment
 services or activities (including central banks)

A Financial Market Regulator is an entity, agency, association, or organisation which:

- 1. a. is owned or controlled by federal, state, regional or local governments, or
 - is established or operates pursuant to international, federal, state, regional or local treaties, laws, or regulations, and
- regulates or supervises institutions engaged in securities, banking, financial, investment, or insurance business, including financial markets with a view to protect the integrity and stability of the financial markets



File name: V4

Specimen 6 – Undertaking

SWIFT Undertaking



Use this form to submit your application as a SWIFT user. The application and admission process to become a SWIFT user and any SWIFT usership are governed by the SWIFT <u>Corporate Rules</u>. The <u>Corporate Rules</u> provide in particular details regarding the SWIFT user categories, SWIFT user eligibility criteria and other conditions for the SWIFT User application and admission process. If you are eligible to become a shareholder of SWIFT, the SWIFT <u>By-laws</u> govern SWIFT shareholding.

SWIFT users accept the SWIFT General Terms and Conditions for and in connection with their use of FIN or SWIFTNet messaging services and various other SWIFT services and products, as explained below.

Together with your application to join SWIFT, you also order or subscribe to various SWIFT services and products, some of them being automatically linked to the SWIFT usership status (e.g. the SWIFT User Handbook or SWIFTSmart), or selected during the application and admission process or listed in the latest SWIFT quotation issued in connection with your application. For more information about the applicable terms and conditions, see the Terms and Conditions section at the end of the SWIFT Undertaking. For more information about the ordered SWIFT services and products, see the related documentation in the User Handbook Online.

Please complete, print and sign the document. Upload the signed copy in the <u>SWIFT Onboarding application</u> and send the original copy immediately to SWIFT. See last section of this document.

SWIFT references

Onboarding reference

Customer number

Company information of the organisation that applies to become a SWIFT User Full legal name and registered address

Legal Entity Name

Building Name

Building Information

Floor

Street Name

Street Number

Postal/Zip code

City

State

Country

Company website

Trading Name

Primary Operating address

Legal Entity Name

Building Name Building Information

Floor

Street Name

Street Number

Postal/Zip code

City State

Country

Company Registration Information

Company Registration Number Trade Registration Authority

Country of Registration

Legal form

S.W.I.F.T. SCRL ("SWIFT") – Avenue Adele 1 – B-1310 La Hulpe – Belgium RPM Nivelles - V.AT BE 0413.330.856 SWIFT Undertaking – May 2017 Customer number: 107778

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Nan of Primary Financial Supervisory Authority Country of Primary Financial Supervisory Authority

Operational Licence Number BIC - Business Identifier Code LEI - Legal Entity Identifier

SWIFT User Category

Swift User Type Swift User Sub Category

Direct Parent Company Information

Legal Entity Name of Direct Parent Parent Country of Registration

Parent BIC

Ultimate Parent Legal Entity Name

Information Legal Name

Ultimate Parent Country of Registration

Sanctions Regulations (if applicable) - Ownership Information

By signing this Undertaking you declare and confirm that the organisation applying to become a SWIFT user herein is not a sanctioned entity, is not owned by a legal or natural person, or does not own a legal entity that is designated under EU, UN or US sanctions regulation.

Primary Business Contact

The Primary Business Contact is the main contact person responsible in your organisation for all matters regarding SWIFT Usership and shareholding (if any), and to inform SWIFT of any corporate or legal changes within your Company that could affect SWIFT Usership. The Primary Business Contact shall be kept current at all times on www.swft.com.

Request references

Title / Salutation

Position

First name

Last Name

E-mail

Office phone number

Swift.com administrators

The SWIFT.com administrators maintain the user accounts and access rights for your organisation for services offered via swift.com

You want to delegate your Swift.com administration:

BIC8 of the delegated institution

SWIFTNet Security Officer

The SWIFTNet Security Officers are responsible for the security administration that involves the creation and maintenance of the digital certificates to be used by your organisation on SWIFTNet.

You want to delegate your SWIFTNet Security:

BIC8 of the administering institution

Terms and conditions

SWIFT Corporate Rules, By-laws and SWIFT General Terms and Conditions:

The application and admission process to become a SWIFT user and any SWIFT usership are governed by the SWIFT Corporate Rules. The

S.W.I.F.T. SCRL ("SWIFT") — Avenue Adele 1 — B-1310 La Hulpe — Belgium RPM Nivelles - VAT BE 0413-330.856 SWIFT Undertaking — May 2017 Customer number: 107778



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SWIFT By-laws govern SWIFT shareholding. The provision and use of FIN or SWIFTNet messaging services and other SWIFT services and products are governed by the SWIFT General Terms and Conditions, as set out below.

Other Terms and Conditions

As applicable, the provision and use of the SWIFT services and products below are governed by the following Terms and Conditions:

SWIFT SERVICE OR PRODUCT	APPLICABLE TERMS AND CONDITIONS
FIN, SWIFTNet messaging services (InterAct, FileAct or Browse), Aliance Lite2, Standardised Corporate Environment (SCORE), Member-administered Closed User Group (MA-CUG), Relationship Management Authorisation (RMA), SWIFT	SWIFT General Terms and Conditions
BIC	The then current version of the ISO 8382 Standard (available at www.iso.org) and of the BIC Registration Procedures (available at www.swift.com/bic) govern the registration of BICs and the related roles and responsibilities of all parties involved. The BIC policy provides specific guidelines for the use of BICs by SWIFT users, in particular as identifiers and addresses within the SWIFT messaging services.
Consulting	SWIFT Consulting Terms and Conditions
SWIFTRef products	SWIFTRef Products Terms and Conditions
SWIFT Directories	Directories Licence Agreement
Hardware security tokens	HSM Tokens and Cards Terms and Conditions
SWIFTSmart	SWIFTSmart – Terms and Conditions SWIFTSmart – Terms of Use
Alliance Essentials Kit, Alliance Access Kit, Alliance Entry Kit, Alliance Gateway Kit, Alliance SWIFTNet Link Kit, Alliance Remote Kit	SWIFT General Terms and Conditions, Directories Licence Agreement, HSM Tokens and Cards Terms and Conditions

Ordering - Privacy:
Use of this ordering service is subject to the <u>SWIFT Ordering Service - Terms and Conditions</u>. SWIFT will process any personal data you provide in or in connection with this form according to the <u>SWIFT Privacy Statement</u>.

By ticking the box you confirm that you accept the terms and conditions here above and that you have read and (if applicable) agreed to the SWIFT Privacy Statement.

Company Signature

The Undersigned declares to have full authority to submit this form for and on behalf of the Company and confirms that the Company and ownership information is complete and current. The Undersigned further declares that the persons identified in this form to act as primary business contact, swift.com administrator and security officer are duly authorised to represent the Company for their respective responsibilities.

Company name Job Title Title / Salutation

Last name First name

Email

Telephone number

Signature (hand-written on printed version):	

Printing

Print, sign (hand-written signature), in accordance with your company's signature policies, the SWIFT Undertaking. Upload as soon as possible a pdf version in the SWIFT on-boarding tool, and courrier the original signed copy without delay to:

S.W.I.F.T. SCRL ("SWIFT") – Avenue Adèle 1 – B-1310 La Hulpe – Belgium RPM Nivelles - VAT BE 0413.330.856 SWIFT Undertaking – May 2017 Customer number: 107778

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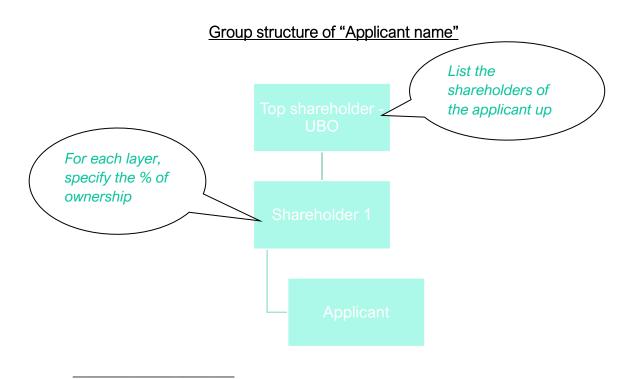


5 Annex 2

5.1 Sample 1 – Group structure

Important note: the below sample of group structure is provided as example. It is not necessary to provide this document if the group structure can be shown via other internal or official sources (as long as the requirements under 3.4 are met)

< on the letterhead of the organisation> (if internal)



[signature] - by any authorised representative of the organisation

Name

Date



5.2 Sample 2 – Board of Directors

Important note: the below sample of Board of Directors is provided as example. It is not necessary to provide this document if the composition of the Board of Directors can be shown via other internal or official sources

< on the letterhead of the organisation> (if internal)

Composition of the Board of Directors of "Applicant name"

The undersigned, Mr/Mrs	, [title], hereby confirm that the following
individuals are active Directors of "Applica	nt name":
 Individual 1 	

- Individual
- Individual 2
- Individual 3Individual 4
- Individual 4Individual 5
- Individual 6
- Individual 7

[signature] - by any authorised representative of the orga	anisation
Name	
Date	

End of document