

Investor CDD checklist — investment funds

A practical checklist for onboarding fund investors, from identification to ongoing monitoring.

INVESTOR / ENTITY	PREPARED BY	DATE	REVIEWED BY
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1. IDENTIFICATION AND VERIFICATION

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	Natural person: full name, date and place of birth, nationality, address; valid identity document verified.	
☐	Legal entity: name, legal form, registered office, registration number; up-to-date register extract and constitutional documents.	
☐	Directors and authorised signatories identified; powers to act verified.	
☐	Remote onboarding: identity verified through reliable, independent means (e.g. qualified electronic identification).	

2. BENEFICIAL OWNERSHIP

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	Ownership chain documented up to the natural persons.	
☐	Persons holding 25% or more of shares, voting rights or other ownership interest identified.	
☐	Control by other means considered (agreements, veto rights, family ties).	
☐	Senior managing official recorded only as a documented fallback.	
☐	Information compared with the central register; discrepancies reported.	

3. PURPOSE AND INTENDED NATURE

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	Purpose of the investment and expected amounts understood and recorded.	
☐	Profile consistent with the investor's activity, wealth and the product.	

4. SCREENING

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	Investor, beneficial owners, directors and signatories screened against sanctions lists.	

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	PEP status checked — including family members and close associates.	
☐	Adverse media reviewed and conclusions documented.	

5. RISK ASSESSMENT

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	Customer risk rating assigned (investor type, geography, product, channel, structure).	
☐	High-risk factors and the business-wide risk assessment taken into account.	
☐	Enhanced due diligence applied where required (PEP, high-risk country, complex structure).	

6. SOURCE OF FUNDS AND WEALTH

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	Subscription paid from an account in the investor's own name, at a regulated institution.	
☐	No third-party payments without documented justification and approval.	
☐	Source of funds — and, where higher risk, source of wealth — evidenced, not just declared.	

7. APPROVAL AND FOLLOW-UP

DONE	INVESTOR CDD CHECKLIST	COMMENT
☐	Senior management approval obtained where required.	
☐	Review frequency set according to risk; trigger events defined.	
☐	Records kept for at least five years after the end of the relationship.	

Disclaimer. General guidance for practitioners, not legal advice. Adapt to your institution, its risk assessment and the rules that apply to it (EU AMLR, national law, supervisory requirements).