# Sources and equivalence rules

LINDBERGH FORMATION — 16 rue de Maillé, 91310 Montlhéry, France · Companies register (RCS) Evry 817 946 114

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Which source proves what, and for how long · fictional document

**Fictional document — demonstration example**

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**Fictional document**, produced for the demonstration. **Every document enters the file with the exact place it came from and the date it was obtained.** The list of sources and their equivalence rules are approved by the bank's lawyers before use.

## The four families of sources

| Family | What it brings | What is kept |
|---|---|---|
| **Documents filed by the client** | Articles of association, director's identity document, proof of address | The file, its filing date, its cross-check against the others |
| **Public company registers** | **Name, legal form, directors, registration, ownership chain** | **The extract's reference and its date** |
| **Sanctions and politically exposed persons lists** | Result of the search | **The date and time of the search — that is what makes the evidence** |

| Family | What it brings | What is kept |
|---|---|---|
| The bank's own data | Group accounts, past incidents, related companies | The identifier of the matched file |

*The beneficial owner is the natural person who genuinely controls the company, beyond the companies that hold it.* The chain is traced tier by tier, **with the percentage held at each level**, and it stops at named natural persons or at an explicit note of the point where public information ends.

## The cross-checking, which is the real work

| Element compared | Against what | Discrepancies across 340 files |
|---|---|---|
| Stated activity | Published activity code | **28** |
| Address on the proof | Address in the articles | **17** |
| Stated director | Published director | 9 |
| Declared turnover | Accounts filed | 7 |
| **Total files concerned** | — | **61 out of 340** |

## The equivalence rule, source by source

| What the source establishes | Validity period retained | Who sets it |
|---|---|---|
| Existence and legal form of the company | 3 months | **The bank's lawyers** |
| **Director's identity** | **Validity period of the document** | **The bank's lawyers** |
| Registered office address | 12 months | The bank's lawyers |
| **List search** | **The same day** | **Re-run at every review** |



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**The list of sources runs to three pages.** Once signed by the lawyers it holds for the 4,800 files of the year — and it is the first document an inspector asks for when he wants to understand how the bank proves what it asserts.

## For the bank to settle

Sources added and validity period retained: _____

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