

KYC (Know Your Customer) Policy

1. Purpose

The purpose of this Know Your Customer (“KYC”) Policy is to outline the procedures and principles for verifying the identity of all Clients of Easi-Portfolio (the “Company”) and for conducting due diligence on their financial activities. This policy is a crucial component of the Company’s broader framework for combating money laundering and terrorist financing, ensuring compliance with all applicable laws and regulations.

2. Key Principles

The Company is committed to the highest standards of anti-money laundering (“AML”) and counter-terrorist financing (“CFT”) compliance. The core principles of our KYC Policy are:

- Identification: Verifying the identity of every Client and, where applicable, the beneficial owner.
- Due Diligence: Conducting appropriate due diligence on all Clients based on a risk-based approach.
- Ongoing Monitoring: Continuously monitoring Client accounts and transactions to detect and report any suspicious activity.
- Record Keeping: Maintaining accurate and up-to-date records of all Client identification and transaction data.

3. Client Identification and Verification

All prospective Clients are required to provide verifiable personal information before being onboarded. This information is used to confirm the identity of the Client and includes, but is not limited to:

- Full legal name
- Date of birth
- Residential address
- Nationality
- Contact details (phone number and email address)
- A valid government-issued photo identification (e.g., passport, national ID card, or driver’s license)
- A recent proof of residence (e.g., a utility bill or bank statement) dated within the last three months

The Company may also require additional documentation for corporate or institutional Clients to identify and verify the legal entity and its beneficial owners.

4. Due Diligence and Risk Assessment

The Company employs a risk-based approach to Client due diligence. All Clients are categorized into risk tiers (low, medium, or high) based on factors such as:

- Geographic location (high-risk jurisdictions)
- The nature of the Client's business or professional activities
- The intended purpose of the account
- The source of funds

Clients designated as high-risk will be subject to Enhanced Due Diligence (EDD), which may include more rigorous verification of identity, deeper scrutiny of the source of funds, and more frequent transaction monitoring.

5. Ongoing Monitoring

Once a Client's account is established, the Company engages in continuous monitoring to identify any changes in the Client's behavior or financial activity. This monitoring includes, but is not limited to:

- Reviewing transaction patterns for unusual or suspicious activity.
- Updating Client information and documentation on a regular basis.
- Comparing Client activity against the initial risk assessment and business purpose.

Any activity that is deemed suspicious or inconsistent with the Client's profile will be promptly investigated and, if necessary, reported to the appropriate authorities in accordance with AML and CFT regulations.

6. Record Keeping

The Company will maintain all Client identification and transaction records for a period of at least five years from the date the business relationship with the Client ends. These records will be kept securely and will be made available to competent authorities upon request.

7. Review and Updates

This KYC Policy will be reviewed and updated regularly to ensure it remains effective and compliant with all new and evolving legal and regulatory requirements.

By opening an account with Easi-Portfolio, you agree to comply with all provisions of this KYC Policy and to provide all information necessary for the Company to fulfil its legal obligations.