

CUSTOMERS' ACCEPTANCE POLICY

KNOW YOUR CUSTOMER (KYC)

&

DUE DILIGENCE

IDENTIFICATION PROCEDURES MANUAL

SPECIFIC CUSTOMER DUE DILIGENCE AND IDENTITY PROCEDURES

A. Natural persons Cyprus Resident:

1. True name and / or names used, based on the official identity card or passport
 - i. Document issued by an independent and reliable source and which bears a photograph of the customer
2. Full permanent address in the Republic, including the postcode
 - i. Visit the customer's home
 - ii. presentation of a recent (up to 6 months) telephone bill, electricity, municipal taxes, or bank account statement, or similar, with the above, documents (to protect against the presentation of forged or counterfeit documents, the presentation of original documents is required).
3. Phone number, landline and mobile, and fax
4. email address, if any
5. Date and place of birth
6. nationality
7. Details of profession and other occupations, including the name of the employer / business organization
8. In addition to the above, where the client was introduced by a trusted member of the staff of the Company, or by other reliable existing client or a third person personally known, member of the Board of Directors, details of these recommendations must be produced and kept in the client's file.

B. Natural persons Non-Cyprus Resident

1. True name and / or names used, based on the official identity card or passport
 - i. Document issued by an independent and reliable source and which bears a photograph of the customer
 - ii. data obtained must disclose the number, date and country of issuance of passport and date of birth of the client
2. Full permanent address, including the postcode
 - i. presentation of a recent (up to 6 months) telephone phone bill, electricity, municipal taxes, or bank account statement, or similar, with the above, document (for protection against the presentation of false documents, the presentation of original documents is required).
3. Phone number, landline and mobile, and fax
4. email address, if applicable
5. Date and place of birth
6. nationality
7. Details of professional and other occupations, including the name of the employer / company

8. In addition to the above, where the client was introduced by a trusted member of the staff of the Company, or by other reliable existing client or a third person personally known, member of the Board of Directors, details of these recommendations must be produced and kept in the client's file.
9. Information regarding public places (functions) owned or held by the customer during the last twelve months and whether is a close relative or close associate of such person in order to determine whether the customer is a politically exposed person
 - i. "politically exposed persons" means the natural persons who have their place of residence in another European Union Member State or in third countries and who are or have been entrusted with prominent public functions and their immediate family members or persons known to be close associates of such persons.

C. Joint accounts

In cases of joint accounts, of two or more persons, the identity of all persons (individuals) that hold or have the right to manage the account, must be verified, as set out in Part A and B above where appropriate

D. Accounts of unions, societies, clubs, provident funds and charitable institutions

1. memorandum and articles of association
2. registration documents
3. certificate of registration
4. list of the members of the Board of Directors/ management Committee
5. the identity of all authorized persons
6. follow identification procedures for the above persons as defined in Part A and B above

E. Accounts of unincorporated businesses, partnerships and other persons with no legal substance

1. Identity of the directors/partners (Part A and B)
2. identity of the beneficiaries (Part A and B)
3. Identity of authorized persons (Part A and B)
4. In the case of partnerships, the original or a certified true copy of the partnership's registration certificate
5. business address
6. nature and size of its activities
7. the financial portrait of the legal person under the provisions of paragraph 21 DI144-2007-08
 - identity info

- identity of beneficiaries
 - in case of legal persons (ownership and control structure, of the customer)
 - information regarding the business activities and the expected pattern and level of transactions
 - residence and business address
 - the purpose and reason for the establishment of a business relationship
 - anticipated account turnover, the nature of the transactions, the expected origin of incoming funds to be credited to the account and the expected destination of outgoing transfers/payments
 - the customer's size of wealth and annual income, and a clear description of the main business / professional activities / operation
 - company's name, Country of incorporation, head offices address, names and identity of beneficial owners, directors, authorized signatories, financial information, ownership structure of the group that the company may be a part of (Country of incorporation of the parent company, subsidiaries and associate companies, the main activities, financial information)
8. Where a formal partnership agreement exist, must be provided and also a mandate from the partnership authorizing the opening of the account and confirming authority to a specific person who will be responsible for its operation.

F. Accounts for Legal Persons

1. Registration number – certificate of registration
2. Registered name and trade name used
3. full corporate registered address and head officers
4. Phone number, fax and email address
5. Members of the Board of Directors
6. Persons authorized to operate the account and to act on behalf of the legal person
7. Real beneficiaries of private and public companies that are not listed in regulated market of a European Economic Area country or a third country with equivalent disclosure and transparency requirements.
8. Registered shareholders that act as nominees of the actual beneficiaries'
9. the financial portrait of the legal person under the provisions of paragraph 21 DI144-2007-08
 - identity info
 - identity of beneficiaries
 - in case of legal persons (ownership and control structure, of the customer)
 - information regarding the business activities and the expected pattern and level of transactions
 - residence and business address

- the purpose and reason for the establishment of a business relationship
 - anticipated account turnover, the nature of the transactions, the expected origin of incoming funds to be credited to the account and the expected destination of outgoing transfers/payments
 - the customer's size of wealth and annual income, and a clear description of the main business / professional activities / operation
 - company's name, Country of incorporation, head offices address, names and identity of beneficial owners, directors, authorized signatories, financial information, ownership structure of the group that the company may be a part of (Country of incorporation of the parent company, subsidiaries and associate companies, the main activities, financial information)
10. certificate of incorporation
 11. good standing certificate
 12. certificate of registered address
 13. Certificate of directors and secretary
 14. memorandum and articles of association
 15. certificate of registered shareholders in the case of private and public companies that are not listed in regulated market of a European Economic Area country or a third country with equivalent disclosure and transparency requirements
 16. a resolution of the board of directors for opening the account and granting authority to those who will operate it
 17. In case of nominee shareholders of the actual beneficiaries, a copy of the trust deed signed between the nominee shareholder and the beneficial owner, by virtue of which the registration of the shares on the name of the nominee shareholder on behalf for the real Beneficiary has been agreed
 18. Documents and data to establish, the identity of persons authorized by the legal person to operate the account, as well as the registered shareholders and beneficial owners of the legal person
 19. Where necessary, a copy of the latest audited financial statements (if available) and / or copies of its latest management accounts.
 20. It is noted that at any times during the business relationship, the Company can obtain additional documents and information if required.

As an additional measure the Company can conduct research and receive information from the records of the Registrar of Companies and Official Receiver of the Republic (for Cypriot companies) in order to ensure that the company (legal person) is not nor is in the process of being dissolved or liquidated or struck off the registry and that it continues to be registered as an operating company.

G. Accounts for Legal Person (Companies or Legal Entities) outside the Republic

1. All documents and information as stated in Part F above must be provided
2. The Company can conduct research and receive information from the Companies Registry or equivalent authority in the country of incorporation (legal entity) abroad (for non-Cypriot companies) and / or request information from other sources in order to ensure that the company (legal person) is not nor is in the process of being dissolved or liquidated or struck off the registry and that it continues to be registered as an operating company.

Shareholder – another entity

In case of client - legal person applying for the conclusion of a business relationship or the execution of an occasional transaction and whose sole or direct shareholder is another legal person, before proceeding to the following must be provided:

1. all documents as provided in Part F
2. ownership structure
3. identity of the individual beneficial owners or/and control the other legal person
4. Identity of persons who have the ultimate control over the legal person's business and assets as describes in Part A & B
5. In the cases that the ultimate control is in the hands of the persons who have the power to manage the funds, accounts or investments of the legal person, without the need for further authorization and who would be in a position to override the internal procedures, we need the identity of persons exercising effective control, as defined in Part A & B, even if they have no direct or indirect interest or an interest of less than 10% of ordinary share capital or voting rights of the legal person.

SHAREHOLDER-TRUST

If the beneficial owner of an entity is a trust then the following documents are required:

1. Name
2. date of establishment
3. Identity of the trustor (Part A & B)
4. Identity of the trustee(Part A & B)
5. identity of the beneficial owners(Part A & B)
6. The nature and purpose of the establishment and activities (memorandum and articles of association)
7. origin of the money, extracts from the trust agreement is needed and other relevant information from the trustees

H. Investment funds, mutual funds and firms providing financial or investment services:

1. a license or authorization from a competent supervisory/regulatory authority of the country of incorporation and operation to provide the said services
2. Evidence that are subject to the supervision for the prevention of money laundering and terrorist financing purposes.
3. In case the person is incorporated and/or operating in a third country the following must be obtained:
 - i. all documents as stated above in Part H
 - ii. copy of the license or authorization granted from a competent supervisory/regulatory authority of its country of incorporation and operation
 - iii. Sufficient data and information to fully understand the control structure and management of the business activities and the nature of the services and activities provided by the customer.
4. In the case of investment funds and mutual funds the Financial Organisation must provide the following
 - i. Identity of the beneficial owners
 - ii. Information regarding their objectives and control structure, including documentation and information for the verification of investment managers, investment advisors, administrators and custodians

I. Nominees or agents of third persons

The following information is required:

1. Verify the identity of the nominees or the agent of the third person(Part A & B)
2. Verify the identity of any third person on whose behalf the nominee or the aren't is acting (Part A & B)
3. Copy of the authorization agreement that has been concluded between the interested parties

NOTE: THE COMPANY AT ANY TIME CAN INQUIRE AND OBTAIN ADDITIONAL DOCUMENTS AND INFORMATION IF REQUIRED IF AT ANY LATER STAGE ANY CHANGES OCCUR IN THE STRUCTURE OF THE OWNERSHIP STATUS OR TO ANY DETAILS, THE CUSTOMERS HAS TO INFORM THE COMPANY AND PROVIDE ANY NEW INFORMATION AND DOCUMENTS. IF IN THE COUNTRY OF THE POTENTIAL/EXISTING CLIENT ANY OF THE REQUIRED DOCUMENT DOES NOT EXIST IN THE FORM REQUIRED BY THE COMPANY THE COMPLIANCE OFFICER MAY ACCEPT A SIMILAR DOCUMENT SERVING THE NEEDS OF DUE DILIGENCE.