



INTELIGO BANK

Customer Due Diligence Guidelines

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Customer Due Diligence Guidelines

As part of our Anti Money Laundering Program (AML), Inteligo Bank's Customer Due Diligence (CDD) Policy consists of the following:

1. Customer Identification

- Customer's personal information such as full and correct name, two or more means of contacting the customer, date and place of birth or incorporation as well as source of funds, source of wealth, the purpose of the account and the nature of the business relationship.
- Identification evidence for all beneficial owners of a firm or business and for the natural person(s) who holds the position of senior managing official(s). The beneficial owner is a natural person who ultimately owns or controls a facility holder; the natural person on whose behalf a transaction is being conducted; or a natural person who exercises ultimate effective control over a legal person or legal arrangement. Where no natural person fits squarely into those categories, it is the person who holds the position of senior managing official.
- For non- face to face customers, copies of any documents provided must be certified as true copies by a suitable certifier.

2. Verification Procedures

- Verification procedures are performed to confirmed that the documentary evidence provided is accurate and reliable. These procedures include, but are not limited to:
 - Verification of the customer's identity using reliable, independent source documents, data, or information;
 - Verification of the identity of any person purporting to act on behalf of the customer and verify that such person is properly authorized to act in that capacity.
 - Verification of the customer's name with restricted lists.
- Where verification of identity is performed without face-to-face contact, additional information might be requested to compensate the resultant higher risk.
- Inteligo Bank does not accept individuals or legal entities that have been included in sanctions lists such as, but not limited to:
 - Office of Foreign Assets Control (OFAC) List.
 - European Union Terrorism Lists.
 - Lists related to the Financing of the Proliferation of Weapons of Mass Destruction, including, among others, United Nations Sanctions lists.

- Other lists defined by local authorities.
- Inteligo Bank does not have or maintain anonymous accounts with fictitious or inaccurate names, or numbered accounts.

3. Monitoring Procedures

The monitoring process is one of the main mechanisms for the detection of unusual operations carried out by customers. On that regard, Inteligo Bank performs its monitoring process through an automated module which is updated in a daily basis and allows the bank to be vigilant and note any significant changes or transactions which are inconsistent with the original stated purpose of the account(s) or the customer profile. The screening and profiling alerts generated by the system lead to apply ongoing due diligence procedures.

In addition, to achieve the most effective method for the monitoring of the accounts and business relationships, a combination of manual procedures, properly trained, vigilant staff and a strong corporate compliance culture, have been developed.

Reporting of suspicious transactions to the appropriate regulatory authority are submitted, based on the applicable laws and regulations as well as best practices and international standards.

4. Enhanced Due Diligence (EDD)

Inteligo Bank's enhanced due diligence (EDD) program applies a risk base approach to customers who have been determined to present a higher risk for money laundering or terrorist financing. The approach is also applied to customers who reside, are citizens or have relationships with a jurisdiction assessed as higher risk.

The bank's EDD program requires to execute an enhanced due diligence in an ongoing basis to all customers classified as sensitive and/or high risk.

5. Politically Exposed Person (PEP)

PEP is defined as an individual who is or has been entrusted with a prominent public function, including heads of state or government, senior politicians, senior civil servants, judges or military officers, senior executives managing public sector companies, important political party officials, among others.

Family members up to first degree of consanguinity, and associates and close friends of a PEP, are also considered high risk or sensitive customers.

Customers identified as PEP will keep this status indefinitely (once a PEP, always a PEP). As a high-risk or sensitive customer, PEPs are subject to enhanced due diligence procedures. In addition, the Relationship Manager is responsible for requesting the customer to provide the names of family members, close associates, and all business accounts where the PEP has more than 10% of ownership.

Note: Procedures described above represent a summary of some of the controls performed by Inteligo Bank Ltd. according to its Know Your Customer Policy.