



INTELIGO SAB

# Customer Due Diligence Guidelines

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COMPLIANCE

## Table of contents

1. Purpose and scope
2. Due Diligence Guidelines

## 1. Purpose and scope

Inteligo SAB, its shareholders, directors, executive officers and employees are bound to complying with Anti Money Laundering and Financing of Terrorism regulation in force, and are committed to implementing and following the Customer Due Diligence (CDD) policies described herein:

## 2. Due Diligence Guidelines

### 2.1 Identification

- Identification of new clients at the onboarding stage includes requiring personal data, source of funds and source of wealth and the purpose of the relationship with Inteligo SAB. Supporting documentation is required when applicable, in accordance with local regulation and internal policies.
- Additional controls are in place for non-face-to-face customer identification as part of customer due diligence procedures.
- Inteligo SAB applies procedures to identify politically exposed persons (PEP), as well as the ultimate beneficial owner with whom a commercial relationship is established, which includes understanding the power structure of the legal entity.
- The customer identification information is updated periodically.

### 2.2 Verification

- Inteligo SAB performs identity verification procedures to ensure the accuracy of the information provided by customers and to confirm that clients do not appear in sanctions lists, assessing risk factors to prevent money laundering, financing of terrorism, fraud and schemes.
- Verification is a process that is based on the documentation provided by customers, data and information obtained from reliable, independent and public sources. Data and documents provided by non-face-to-face customers are also verified by using local government data bases and identity validation tools and, if necessary, customers can be contacted for additional verification.
- Inteligo SAB does not accept individuals or business customers that have been included in the following sanctions lists:
  - 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 SAB does not engage with clients who refuse to be identified or do not provide sufficient documentation according to local regulation and internal policies and procedures.

### 2.3 Monitoring of operations

Monitoring transactions is one of the main mechanisms for the detection of unusual transactions carried out by customers. Inteligo SAB performs ongoing monitoring of all business relationships, using a risk-based approach to ensure the customer's behavior is consistent with their risk profile. The AML Officer reports suspicious transactions to the local regulatory authority, based on local law and internal policies. These reports are confidential.

## **2.4 Enhanced Due Diligence (EDD)**

In addition to due diligence measures described above, enhanced due diligence applies a risk-based approach which requires for high-risk and sensitive customers an annual review by the AML Officer in collaboration with the commercial department, which may involve contacting the customer by phone, email and/or onsite visits. New sensitive risk customers are approved by senior management at the beginning of the business relationship.

EDD also includes but is not limited to customer's transactions review, adverse media check, screening sanctions lists, request additional information and review of supporting documents.

## **2.5 Politically Exposed Persons - (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 second degree of consanguinity and affinity, and close associates 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, all PEPs are subject to enhanced due diligence procedures, which involve collecting data of close family members, close associates and all businesses where the PEP has more than 25% of ownership.