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EFFECTIVE CUSTOMER DUE DILIGENCE (° CDD“) MEASURES ARE ESSENTIAL TO THE MANAGEMENT OF MONEY LAUNDERING AND TERRORIST FINANCING RISK CDD MEANS IDENTIFYING THE CUSTOMER AND VERIFYING THEIR TRUE IDENTITY ON THE BASIS OF DOCUMENTS, DATA OR INFORMATION BOTH AT THE MOMENT OF STARTING A BUSINESS RELATIONSHIP WITH CUSTOMER AND ON AN ONGOING BASIS. THE CUSTOMER IDENTIFICATION AND VERIFICATION PROCEDURES REQUIRE, FIRST, THE COLLECTION OF DATA AND, SECOND, ATTEMPTSTO VERIFYTHAT DATA.

DURING THE JMI BROKERS REGISTRATION PROCESS AN INDIVIDUAL CUSTOMERS PROVIDE THE FOLLOWING IDENTIFICATION INFORMATION TO THE COMPANY:

- CUSTOMER'S FULL NAME;
- CUSTOMER'S DATE OF BIRTH;
- COUNTRY OF RESIDENCE/LOCATION OF CUSTOMER;
- MOBILETELEPHONE NUMBER AND E-MAIL.

DURING THE JMI BROKERS REGISTRATION PROCESS A CORPORATE CUSTOMERS PROVIDE THE FOLLOWING IDENTIFICATION INFORMATION TO THE COMPANY:

- FULL COMPANY NAME;
- REGISTRATION NUM8ER AND DATE;
- COUNTRY OF REGISTRATION/INCORPORATION;
- REGISTERED ADDRESS;
- MO8ILETELEPHONE NUMBER AND E-MAIL.

AFTER RECEIVING THE IDENTIFICATION INFORMATION THE COMPANY'S STAFF SHOULD VERIFY THIS INFORMATION REQUESTING THE APPROPRIATE DOCUMENTS.

APPROPRIATE DOCUMENTS FORVERIFYINGTHE IDENTITY OF CUSTOMER

INCLUDE, BUTARE NOT LIMITEDTO,THE FOLLOWING:

- FOR AN INDIVIDUAL CUSTOMER: A HIGH RESOLUTION SCANNED COPY OR PHOTO OF PAGES OF A PASSPORT OR ANY

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OTHEFI NATIONAL ID, INDICATING FAMILY NAME AND NAME(S), DATE AND PLACE OF BIRTH, PASSPORT NUMBER, ISSUE AND EXPIRY DATES, COUNTRY OF ISSUE AND CLIENT'S SIGNATURE.;

- FOR A CORPORATE CUSTOMER: A HIGH-RESOLUTION COPY OF DOCUMENTS SHOWING THE EXISTENCE OF THE ENTITY, SUCH AS CERTIFICATE OF INCORPORATION, AND, WHERE APPLICABLE, CERTIFICATE OF CHANGE OF NAME, CERTIFICATE OF GOOD STANDING, ARTICLES OF INCORPORATION, A GOVERNMENT ISSUED BUSINESS LICENSE (IF APPLICABLE), ETC.

TO VERIFY PROOF OF ADDRESS OF THE CUSTOMER THE COMPANY REQUIRES ONE OF THE FOLLOWING TO BE PROVIDED, IN THE SAME CORRECT NAME OF THE CUSTOMER:

- A HIGH-RESOLUTION COPY OF A UTILITY BILL (FIXED-LINE PHONE, WATER, ELECTRICITY) ISSUED WITHIN THE LAST 3 MONTHS;
- A COPY OF A TAX OR RATES BILL FROM A LOCAL AUTHORITY;
- A COPY OF A BANK STATEMENT (FOR A CURRENT ACCOUNT, DEPOSIT ACCOUNT OR CREDIT CARD ACCOUNT);
- A COPY OF A BANK REFERENCE LETTER.

WHEN MAKING A FUNDS DEPOSIT OR FUNDS WITHDRAWAL VIA CREDIT/DEBIT CARD A CUSTOMER IS REQUIRED TO PROVIDE A SCANNED COPY OR PHOTO OF THE CREDIT/DEBIT CARD (FRONT AND BACK SIDE). THE FRONT SIDE OF CREDIT/DEBIT CARD SHOULD SHOW THE CARDHOLDER'S FULL NAME, THE EXPIRY DATE AND THE FIRST SIX AND THE LAST FOUR DIGITS OF THE CARD NUMBER (THE REST OF THE DIGITS MAY BE COVERED). THE COPY OR SCAN OF THE REVERSE SIDE OF CREDIT/DEBIT CARD SHOULD SHOW THE CARDHOLDER'S SIGNATURE, BUT THE CVC2/CVV2 CODE MUST BE MASKED.



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IF AN EXISTING CUSTOMER EITHER REFUSES TO PROVIDE THE INFORMATION DESCRIBED ABOVE OR IF A CUSTOMER HAS INTENTIONALLY PROVIDED MISLEADING INFORMATION, THE COMPANY, AFTER CONSIDERING THE RISKS INVOLVED, WILL CONSIDER CLOSING ANY OF AN EXISTING CUSTOMER'S ACCOUNT.

THE REGULATIONS MEASURES REQUIRE FURTHER RESEARCH AND IDENTIFICATION OF CUSTOMERS WHO MAY POSE A POTENTIALLY HIGH RISK OF MONEY LAUNDERING/TERRORISM FINANCING. IF THE COMPANY HAS ASSESSED THAT THE BUSINESS RELATIONSHIP WITH A CUSTOMER POSE A HIGH RISK IT WILL APPLY THE FOLLOWING ADDITIONAL MEASURES:

OBTAINING THE INFORMATION RELATING TO THE SOURCE OF THE FUNDS OR THE WEALTH OF THE CUSTOMER WILL BE REQUIRED (THIS WILL BE DONE VIA E-MAIL OR PHONE); SEEK FURTHER INFORMATION FROM THE CUSTOMER OR FROM COMPANY'S OWN RESEARCH AND THIRD PARTY SOURCES IN ORDER TO CLARIFY OR UPDATE THE CUSTOMER'S INFORMATION, OBTAIN ANY FURTHER OR ADDITIONAL INFORMATION, CLARIFY THE NATURE AND PURPOSE OF THE CUSTOMER'S TRANSACTIONS WITH COMPANY.

WHEN OBTAINING INFORMATION TO VERIFY THE CUSTOMER'S STATEMENTS ABOUT SOURCE OF FUNDS OR WEALTH, THE COMPANY'S STAFF WILL MOST OFTEN ASK FOR AND SCRUTINISE DETAILS OF THE PERSON'S EMPLOYMENT STATUS OR BUSINESS/OCCUPATION.

THE COMPANY'S STAFF WILL ASK FOR WHATEVER ADDITIONAL DATA OR PROOF OF THAT EMPLOYMENT/OCCUPATION THAT MAY BE DEEMED NECESSARY IN THE SITUATION, PARTICULARLY THE APPROPRIATE CONFIRMING DOCUMENTS (EMPLOYMENT AGREEMENTS, BANK STATEMENTS, LETTER FROM EMPLOYER OR BUSINESS ETC.).

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THE COMPANY WILL CONDUCT ONGOING CUSTOMER DUE DILIGENCE AND ACCOUNT MONITORING FOR ALL BUSINESS RELATIONSHIPS WITH CUSTOMERS. IT PARTICULARLY INVOLVES REGULARLY REVIEWING AND REFRESHING COMPANY'S VIEW OF WHAT ITS CUSTOMERS ARE DOING, THE LEVEL OF RISK THEY POSE, AND WHETHER ANYTHING IS INCONSISTENT WITH INFORMATION OR BELIEFS PREVIOUSLY HELD ABOUT THE CUSTOMER. IT CAN ALSO INCLUDE ANYTHING THAT APPEARS TO BE A MATERIAL CHANGE IN THE NATURE OR PURPOSE OF THE CUSTOMER'S BUSINESS RELATIONSHIP WITH COMPANY.

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