





The Company has put in place 'Know Your Customer' (KYC) programmes as an essential element for service, risk management and control procedures. Such programmes include:

### 3.1. Customer Identification

In order to comply with the laws of Anti-Money Laundering, the Company requires two different kind of documentation to be able to verify the identity of the customer as below:

- i. A legal government-issued, identifying document with the picture of the customer on it. It may be a government-issued passport, driver's license (for countries where the driver's license is a primary identification document) or local ID card (no company access cards).
- ii. A proof of residency with the customer's own name and actual address issued within the last six months. It may be a utility bill, a bank statement, an affidavit, or any other document with the customer's name and address from an internationally recognized organization.

### 3.2. On-going monitoring

On-going monitoring is an essential aspect of effective KYC procedures. The Company can only effectively control and reduce the risk if it has an understanding of normal and reasonable account activity of its customers so that it has means of identifying transactions which fall outside the regular pattern of an account's activity. Without such knowledge, it is likely to fail in its duty to report suspicious transactions to the law enforcement bodies in cases where the Company is required to do so. The extent of the monitoring needs to be risk-sensitive.

For all accounts, the Company has systems in place to detect unusual or suspicious patterns of activity. This can be done by establishing limits for a particular class or category of accounts. Particular attention is paid to transactions that exceed these thresholds.

Certain types of transactions alert to the possibility that the customer is conducting unusual or suspicious activities. They may include transactions that do not appear to make economic or commercial sense (big transactions), or that involve large amounts of cash deposits that are not consistent with the normal and expected transactions of the customer.

### 3.3. Record Keeping

The Company shall keep records for a period of at least one year. The one year period is calculated following the carrying out of the transactions or the end of the business relationship.

The following records shall be kept:

- i. Copies of the evidential material of the customer identity.
- ii. Relevant evidential material and details of all business relations and transactions, including documents for recording transactions in the accounting books and
- iii. Relevant documents of correspondence with the customers and other persons with whom they keep a business relation.

### 3.4. Risk Management

Effective KYC procedures embrace routines for proper management oversight, systems and controls, segregation of duties, training and other related policies. The board of directors of the Company is fully committed to an effective KYC programme and procedures that ensures their effectiveness. Explicit responsibility is allocated within the organization for ensuring that the Company's policies and procedures are managed effectively.

### 3.5. On-going Employee Training Program

The Company maintains an on-going employee training program so that the staff are adequately trained in KYC procedures. The timing and content of training for various staff categories is adapted by the Company for its own needs. Training requirements should have a different focus for new staff, front-line staff or staff dealing with new customers. New staff are educated in the importance of KYC policies and the basic requirements at the Company. Staff members who deal directly with the customers are trained to verify the identity of new customers, to exercise due diligence in handling accounts of existing customers on an on-going basis and to detect patterns of suspicious activity. Regular refresher training is provided to ensure that employees are reminded of their responsibilities and are kept informed of new developments. It is crucial that all relevant staff fully understand the need for and implement KYC policies consistently. A culture within services that promotes such understanding is the key to a successful implementation.

**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 CUSTOMER HAS TO INFORM THE COMPANY AND PROVIDE ANY NEW INFORMATION AND DOCUMENTS.**

**IF IN THE COUNTRY OF THE POTENTIAL/EXISTING CUSTOMER ANY OF THE REQUIRED DOCUMENT DOES NOT EXIST IN THE FORM REQUIRED BY THE COMPANY THE COMPANY MAY ACCEPT A SIMILAR DOCUMENT SERVING THE NEEDS OF DUE DILIGENCE.**

**THESE GUIDELINES HAVE BEEN IMPLEMENTED TO PROTECT THE COMPANY AND ITS CLIENTS.**

**IF YOU HAVE ANY INQUIRIES, PLEASE CONTACT US VIA E-MAIL: [info@omegamarkeets.com](mailto:info@omegamarkeets.com)**