

# KYC POLICY

## 1. Introduction

At Berrypax, we uphold the highest standards of integrity and regulatory compliance. A fundamental aspect of our commitment is the implementation of rigorous Know Your Customer (KYC) procedures. These policies are designed to prevent financial crimes such as money laundering, terrorist financing, and fraud while safeguarding our clients' interests and maintaining the integrity of our platform. This document outlines the procedures we have instituted to verify client identities, understand the nature of their activities, monitor transactions for suspicious behavior, and ensure strict compliance with legal and regulatory obligations.

## 2. Purpose

The objectives of this KYC policy are to:

- Authenticate and verify customer identities.
- Gain insight into customer activities and transactions.
- Monitor transactions for indications of suspicious behavior.
- Adhere to all legal and regulatory requirements.

## 3. Customer Identification Process

### 3.1 Identification Documents

Customers must provide valid and up-to-date identification documents, including:

- A government-issued photo ID (e.g., passport, driver's license).
- Proof of address (e.g., utility bill, bank statement).
- Proof of payment method.

### 3.2 Risk-Based Approach

We employ a risk-based methodology for customer due diligence, adjusting the level of scrutiny based on factors such as risk profile, transaction volume, and geographical location.

### 3.3 Enhanced Due Diligence (EDD)

For high-risk customers or transactions, we implement enhanced due diligence procedures, which may include additional documentation and scrutiny. Supplementary documents may include:

- Business licenses.
- Financial statements.
- Declarations of source of funds.
- References from financial institutions.

Clients subject to EDD will receive notification detailing the specific requirements and reasons for the additional scrutiny.

## 4. Client Registration and Initial KYC Screening

- Upon registration, clients receive an email detailing the KYC screening process.
- Completion of the verification process is mandatory before activating an account.
- Failure to complete verification results in temporary account suspension until compliance is achieved.

## **5. Compliance with KYC Screening and Internal Policies**

- Clients must comply with requirements set by our designated third-party KYC verification service provider in addition to our internal KYC policies.
- Once third-party verification is approved, our compliance team conducts additional manual checks to ensure full regulatory compliance.

## **6. Verification Finalization and Fund Deposit**

- Upon successful verification, clients may deposit funds into their accounts.
- Before depositing funds, clients must sign a declaration form affirming their payment and agreement with our policy.

## **7. Declaration of Deposit**

Upon verification completion, clients receive a Declaration of Deposit document, which includes the following acknowledgments:

- Confirmation that all transactions are initiated and authorized by the client.
- Understanding of the document's alignment with our Anti-Money Laundering (AML) Policy and regulatory requirements.
- Acceptance of responsibility for obtaining necessary trading licenses and understanding associated risks.
- Acknowledgment of responsibility for all trading activities and risks related to CFD trading.

## **8. Ongoing Monitoring**

- BerryPax continuously monitors transactions and platform activities for unusual or suspicious behavior.
- Transactions that deviate from a client's typical pattern or are deemed high-risk undergo further investigation.

## **9. Risk Assessment**

BerryPax conducts a comprehensive risk assessment for each customer, considering:

- Geographic location: Evaluating jurisdictional risks associated with money laundering and terrorist financing.
- Nature of business: Assessing risks inherent in specific industries or activities.
- Transaction history: Analyzing past transactions to detect anomalies.
- Background checks: Reviewing public records and databases for reputational and legal risks.

Clients are categorized into risk levels (low, medium, high), with corresponding due diligence measures applied. Risk assessments are periodically updated based on changes in customer behavior or regulatory requirements.

## **10. Record Keeping**

- Berrypax maintains comprehensive records of customer identification, due diligence procedures, and transaction history in secure databases.
- These records include identification documents, transaction details, risk assessments, and customer correspondence.
- Data storage practices comply with relevant data protection laws and regulations to ensure confidentiality and security.
- Records are retained for the legally required duration and then securely disposed of or anonymized.

## **11. Staff Training and Awareness**

- Our staff undergo continuous training on KYC procedures and detecting suspicious activities.
- Regular awareness programs ensure staff are updated on evolving regulatory requirements and financial crime trends.

## **12. Customer Communication**

- Clients are informed of KYC requirements during onboarding and throughout their engagement with the platform.
- Berrypax provides clear and transparent communication channels for clients to address KYC-related inquiries.

## **13. Customer Rights and Responsibilities**

- Clients have the right to access and correct their personal information.
- Clients must provide accurate and up-to-date information.
- Clients are required to comply with all KYC requests and submit additional documentation as needed.

## **14. Acknowledgment of Regulatory Changes**

- Berrypax remains committed to monitoring changes in regulatory requirements and industry best practices.
- Our KYC policy is reviewed periodically and updated as necessary to address emerging risks and compliance requirements.
- Clients are notified of significant policy changes and provided guidance on how these changes may impact their account.

## **15. Compliance and Review**

- The KYC policy undergoes regular reviews and updates to enhance its effectiveness in mitigating financial crime risks.
- Compliance with this policy is subject to periodic audits and assessments.

## 16. Conclusion

Berrypax is steadfast in upholding the highest standards of integrity, transparency, and regulatory compliance. The implementation of this KYC policy is crucial to safeguarding our platform against financial crimes while fostering trust among our customers and stakeholders.

**Note:** This KYC policy serves as a foundational framework and may be customized in accordance with specific regulatory requirements and the unique characteristics of the financial/forex platform. Legal consultation is recommended to ensure full compliance with applicable laws and regulations.

