



# KYC POLICY

# KNOW YOUR CUSTOMER POLICY

## 1. Introduction

1.1. In compliance with the Anti-Money Laundering (AML) Policy, the Company has established the Know Your Customer (KYC) Policy in due diligence procedures for customer identification.

1.2. This policy is also for the intention of grand larceny, identity theft, financial fraud and terrorist financing.

1.3. Certain information of the Client must be provided to the Company to verify his/her identity, nature of business and his/her intended purpose of transactions.

1.4. The Company requires the Client to submit all documents as soon as possible to avoid any delay when making transactions.

1.5. In certain conditions, the Company reserves the right to demand the necessary documents to be provided before allowing the Client to perform further actions including, but not limited to, depositing or trading.

## 2. Identification

2.1. The following factors are considered in assessing the risks of violating the AML Policy:

2.1.1. Whether the Client is an individual, an intermediary, a financial or non-financial institution, or a regulated person or entity;

2.1.2. If the Client is already a registered client;

2.1.3. How the Client became a customer of the Company;

2.1.4. If the Client's business or account has a greater likelihood of being involved in illegal activities; and

2.1.5. If the Client's residence is from a jurisdiction with bank secrecy laws.

2.2. The Company will obtain the necessary information to verify the Client's identity. It is the Client's sole responsibility to ensure that the information and other personal details he/she provides the Company are true, accurate and complete.

2.3. In order to complete the compliance procedure for identity verification, the Client should be able to provide the following, but will not be limited to:

2.3.1. Proof of identity which can be a copy of a government-issued I.D., national or foreign passport (with 2 pages shown), and/or a driver's license (front and back side).

2.3.2. Proof of residence that should not be older than three (3) months, showing the name and complete address which should be identical to the Client's registered information with the Company. This document can be in the form of bank statement, utility bill, certification of residence confirmation, and/or lease agreement issued by government.

2.3.3. Copy of your card/s used to deposit where the front side should show the first six (6) and last four (4) digits, and the expiration date.

2.4. The Client can scan or take a clear photo of the documents with legible texts and with all corners and sides visible. The Client should provide the foregoing documents only in the format of JPG, PNG, and/or PDF without password protection. Documents can be submitted through email ([info@mulliganib.com](mailto:info@mulliganib.com)), or through uploading in the website.

### **3. Privacy of Data and Information**

3.1. The Company holds the security of documentation at highest priority and would treat all documents received with utmost respect and confidentiality. All records that the Company acquires are protected with highest level possible of encryption every step of the verification process.

