INTEGER WEALTH GLOBAL

Policy Document

Client Qualification and Compliance

Issue: October 2025

1. Purpose and Scope

This policy outlines the qualification criteria and compliance requirements for corporate clients seeking capitalisation through the IWG investment model. It applies to all prospective clients across IWG's regulated jurisdictions and ensures alignment with European financial services standards, risk management protocols, and operational integrity.

The purpose of this policy is to:

- Ensure that all clients admitted to the IWG investment model are of suitable financial and operational standing
- Safeguard IWG, its partners, and investors from exposure to financial, reputational, and regulatory risks
- Comply with international standards of Anti-Money Laundering (AML), Know Your Client (KYC), and Due Diligence (DD) procedures in line with EU directives and local financial authority requirements.

2. Eligibility Criteria for Capitalised Investment Fund Setup

To qualify for the establishment of a fully capitalised investment fund under the IWG model, a prospective client must meet the following minimum standards:

2.1 Corporate Status and Trade History

- The client must be a registered corporate entity (limited company, public limited company, partnership, or equivalent) operating lawfully within its jurisdiction.
- Demonstrable trade history with a proven track record of consistent product or service delivery within its industry sector.
- Evidence of operational maturity and sectoral relevance.
- The entity must not be under insolvency proceedings or subject to regulatory sanctions.

2.2 Financial Capability and Investment Readiness

- Audited financial statements for the past 3 years, showing stability and growth and verifiable trade history within its respective industry sector.
- The client's record must evidence a proven track record of product or service delivery, supported by past and current contracts, client references, or sectoral performance data.
- Demonstrated profitability or evidence of sustainable growth and liquidity;
- Positive credit ratings, banking references, and absence of material financial disputes.
- The client must exhibit the financial capacity to manage and sustain large-scale investments into its business operations.

- Clear demonstration of the ability to manage large-scale investments, including:
- Capital inflows
- Asset allocation
- Risk mitigation strategies
- Proof of affordability for:
- Investment fund setup costs
- Ancillary expenses (legal, regulatory, operational)
- Ongoing management fees and compliance costs

2.3 Affordability and Cost Capacity

- The client must demonstrate proof of affordability for:
  - The setup and structuring costs of the investment fund.
  - All associated professional, legal, compliance, and administrative fees.
  - Any additional operational or transactional costs as required by IWG and its affiliate service providers.
- This affordability must be shown through available reserves, verified funding sources, or equivalent financial guarantees.

2.4 Human Resource and Management Competence

A qualifying client must either have in place or commit to appointing the following internal key personnel, each fully qualified and competent within their respective roles:

- **Legal Advisor** – to oversee legal documentation, contract review, and regulatory adherence.
- **Project Manager** – to coordinate project execution, milestones, and deliverables in alignment with IWG oversight.
- **Account Manager** – to manage financial reporting, budgeting, and compliance with investment disbursements.
- **Liaison Officer** – to maintain consistent communication between the client and IWG throughout all project phases.

2.5 Each role must be documented with:

- CVs and professional certifications
- Employment contracts or engagement letters
- Role-specific responsibilities aligned with IWG's operational standards

3. Compliance and Due Diligence

All prospective clients must undergo comprehensive compliance vetting, including but not limited to:

3.1 Know Your Client (KYC)

- Verification of corporate registration and beneficial ownership;
- Identification of directors, shareholders, and ultimate beneficial owners (UBOs);
- Validation of the business structure and jurisdictional integrity.

3.2 Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF)

- Screening against international sanctions lists (e.g., EU, UN, OFAC);
- Review of the client's transactional history for any suspicious or irregular activity;
- Verification of source of funds and source of wealth documentation.

3.3 Legal and Regulatory Review

- Confirmation of compliance with applicable national and EU laws;
- Review of any pending or past legal proceedings that may impact investment risk;
- Assessment of licensing, certifications, or permits necessary for lawful operation.

3.4 Risk Assessment and Approval

- Each client shall undergo a formal Risk Assessment Report (RAR) conducted by IWG's compliance department.
- Clients will be classified as Low, Medium, or High Risk based on financial, operational, and jurisdictional criteria.
- Only clients rated as Low or Medium Risk will be approved for progression to the capitalisation phase, unless exceptional justification is granted by IWG's executive committee.

4. Ongoing Compliance Obligations

Following qualification and fund establishment, all clients shall be subject to ongoing compliance monitoring including:

- Annual financial review and audit of the client entity.
- Quarterly performance reporting on project and fund utilisation.
- Continuous AML/KYC re-screening in accordance with EU and local regulatory timelines.
- Disclosure obligations for any material changes in ownership, management, or business activity.

Failure to maintain compliance will result in suspension or termination of the investment relationship at IWG's discretion.

5. Data Protection and Confidentiality

All client data collected under this policy will be handled in accordance with the EU General Data Protection Regulation (GDPR) and applicable local privacy laws.

IWG shall maintain confidentiality of all client information, except where disclosure is required by law or regulatory authority.

6. Documentation and Approval Process

Clients must submit a full qualification dossier including:

- Corporate registration documents
- Financial statements and audit reports
- Proof of affordability and funding sources
- Staff credentials and governance structure
- Business plan outlining investment objectives and fund utilisation

IWG's Compliance and Investment Committees will jointly review each application. Approval is contingent upon:

- Satisfactory due diligence outcomes
- Alignment with IWG's investment philosophy and risk appetite
- Regulatory clearance in the relevant jurisdiction

7. Ongoing Monitoring and Requalification

7.1 Approved clients are subject to:
- Annual requalification reviews
- Periodic compliance audits
- Mandatory reporting of material changes in structure, personnel, or financial status

7.2 Failure to maintain qualification standards may result in:
- Suspension of investment activity
- Termination of fund management agreements
- Regulatory reporting where applicable

7.3 KYC and AML Screening
- Identity verification of company directors and beneficial owners
- Screening against international sanctions lists
- Source of funds and source of wealth verification

7.4 Regulatory Alignment
- Jurisdictional compliance checks based on the client's domicile and operational footprint
- Assessment of regulatory licenses, permits, and reporting obligations

7.5 Operational Risk Assessment
- Review of internal controls and governance structures
- Evaluation of business continuity and investment risk management protocols

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- Annual requalification reviews
- Periodic compliance audits
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11. Governance and Review

This policy shall be and is:

- Approved and maintained by the IWG Compliance Committee.
- Reviewed annually to ensure continued alignment with evolving EU directives, FATF recommendations, and local financial authority standards.
- Updated as necessary to reflect legislative, operational, or strategic developments within IWG.

12. Failure to maintain qualification standards may result in:

- Suspension of investment activity
- Termination of fund management agreements
- Regulatory reporting where applicable