



C&M Asset Management, Inc.

Know Your Customer and Anti-Money Laundering  
Requirements



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## 1. Introduction

As an entity regulated by the Securities Exchange Commission (the “**SEC**”), we are required to apply risk-based customer due diligence measures and take as many steps as may be necessary to prevent our services from being used for money laundering or terrorist financing.

Our internal controls effectively monitor and manage our firm’s compliance with anti-money-laundering (“**AML**”) policies and procedures. These controls have been designed in appropriateness to the size of our firm, the products we offer, the parts of the world where we do business and the types of customers who use our services.

## 2. Know Your Customer

Before we accept any individual or company as a client, we must take reasonable steps to ensure we are in possession of sufficient personal and financial information about that potential customer in regard to the services that we offer.

## 3. Documents required for account verification

In order to pass our verification process and access our services, potential clients need to provide the following documents:

### Individual / joint accounts

- A **valid copy of the Passport / ID / driving license** in force of the account owner (including the reverse in case of ID, driving license, etc.).
  - A **valid proof of residence** (e.g. bank statement, utility bill, etc.) **issued in the last 3 months**, displaying the individual’s domicile.

Every single customer’s sign up process and deposit / withdrawal transaction is subject to the successful completion of a screening system provided by a third party’s software.

On top of the information above, we may request additional information depending on the customer’s nationality and / or domicile (e.g. US citizens must also provide a document to verify their US residency; Spanish residents must also provide a sworn declaration in accordance with the Spanish CNMV requirements, etc.).

### Corporate accounts

- Legal Entity Identifier (LEI)
- Memorandum and Articles of Association
- Copy of register of Shareholders
- Copy of Register of Directors
- Proof of Registered address (original utility bill or bank statement displaying the Company’s Name and Registered Address dated within the last 3 months)
- Proof of Operating address (original utility bill or bank statement displaying the Company’s Name and Registered Address dated within the last 3 months)
- ID and Proof of Address for:

1. All active Directors
  2. Shareholders/Beneficial Owners with a holding of 25% or more
- Business certificates (if any)
  - Copies of last year's audited accounts and auditors' report (where applicable)
  - Power-Point presentation on nature of business, products/services offered.

### **Suitability and Appropriateness**

In addition to the information above, before accepting any client, we must obtain from the client such information as is necessary for us to understand the essential facts about him and have a reasonable basis for believing, giving due consideration to the nature and extent of the services provided, that the specific services:

- a) meet his investment objectives
- b) are such that he/she is able financially to bear any related investment risks consistent with his investment objectives
- c) are such that he/she has the necessary experience and knowledge in order to understand the risks involved in the transaction or in the management of his portfolio

The information regarding the investment objectives of a client must include, where relevant, information on the length of time for which he wishes to hold the investment, his preferences regarding risk taking, his risk profile, and the purposes of the investment.

The information regarding the financial situation of a client must include, where relevant, information on the source and extent of his regular income, his assets, including liquid assets, investments and real property, and his regular financial commitments.

We will not, under any circumstance, provide services to anyone who:

Declines or fails to provide as much information as we may deem necessary to identify any client as detailed in this document

Is reasonably suspected of participating in any form of financial or other crime, including fraud, bribery, money laundering, market abuse, cybercrime, etc.