



EFFORTLESSWEALTHGROUP LIMITED

# KNOW YOUR CLIENT (KYC) POLICY

LAST UPDATED: 04 APRIL 2025

ISSUING PARTY

EFFORTLESSWEALTHGROUP LIMITED

RECEIVING PARTY

EWG MEMBERS

## **01. KYC Policy Objective**

- 1.1. The objective of the KYC policy at EffortlessWealthGroup (EWG) is to prevent the misuse of our services for money laundering or terrorist financing activities. Implementing robust KYC procedures allows EWG to better understand and manage its clients and their financial transactions effectively, thereby enhancing our ability to manage risks. In the event of any suspicious activities, EWG is committed to documenting and reporting such instances to the appropriate regulatory authorities in compliance with legal and regulatory requirements. Additionally, accounts associated with fraudulent activities will be promptly closed to safeguard the integrity of our operations.

## **02. KYC Prevention Objectives**

- 2.1. The prevention objectives of EWG's KYC policy are designed to safeguard the integrity and security of our operations:
  - 2.1.1. Data Integrity: To maintain the confidentiality and integrity of sensitive data obtained from Member account information and transactional activities.
  - 2.1.2. Crime Prevention: To deter criminal elements from utilizing EWG for money laundering activities.
  - 2.1.3. Member Understanding: To enhance the understanding of our Members and their financial dealings, which aids in more effective risk management.
  - 2.1.4. Suspicious Activity Monitoring: To establish robust controls for the detection and reporting of suspicious activities in line with applicable laws and procedures.
  - 2.1.5. Regulatory Compliance: To ensure adherence to all applicable laws and regulatory guidelines, thus upholding EWG's commitment to legal and ethical standards.

## **03. Required Documents for Account Opening**

3.1. EWG requires the following documents from individuals when opening an account to ensure compliance with KYC regulations:

3.1.1. Identification Proof: A copy of a valid National ID, Passport, or Driving License showing the Member's photo and signature.

3.1.2. Proof of Residence: A copy of a recent Utility Bill, Bank Statement, or Residence Certificate displaying the Member's name and address, dated within the last 3 months.

#### **04. Verification Process**

4.1. If a Member is unable to provide a recent proof of residence at the time of account opening, they will have a thirty-day grace period to submit this document. During this period, the account will be considered partially verified, allowing only capital allocation and capital growth monitoring.

4.2. Should the thirty-day period elapse without the proof of residence being provided, the account will be closed, and any accrued profits will be transferred to the Member. Capital allocations are fully committed upon account activation, and a Member's principal capital is non-withdrawable or refundable.

4.3. Full account verification is achieved once all required documents are submitted to EWG.

#### **05. Capital Allocation: Proof of Transfer**

5.1. For proof of transfer at the stage of capital allocation, EWG requires either a screenshot or PDF file, which will be requested via an on-platform, file upload button, after the Member selects their preferred method of funding.

5.2. At any point during your EWG Membership or within 6 months of a cancelled membership, EWG reserves the right to request the following in relation to your capital allocation:

5.2.1. A copy of your credit/debit card, used to allocate capital (front side with only the last 4 digits visible, back side with the CVV covered).

5.2.2. Bank statement of the account used to send the capital allocation, showing other transactions covered.

5.3. If you have any questions, please do not hesitate to contact our support team at [onboarding@effortlesswealthgroup.com](mailto:onboarding@effortlesswealthgroup.com).

## **06. Document Security and Confidentiality**

6.1. EFFORTLESSWEALTHGROUP LIMITED prioritizes the security of our members' documents with the highest level of respect and confidentiality. All documents submitted to us during the KYC process are protected with state-of-the-art encryption technologies throughout the review process, ensuring your personal information remains secure and private. We adhere to the highest standards of data protection and are registered with, and follow the provided guidelines of, the Information Commissioners Office, registration number: ZB881519.

## **07. Introduction to KYC Tiers**

7.1. At EffortlessWealth Group, we implement a tiered approach to our Know Your Client (KYC) process. This structured system is designed to enhance user experience and facilitate easier access to our services, while also ensuring robust compliance with Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations. To meet our commitment to regulatory standards and protect against financial crimes, we reserve the right to collect and verify KYC data within our pre-set verification tiers.

## **08. Trigger Events for KYC Verification**

8.1. Verification of KYC data is generally routine but becomes particularly crucial under specific circumstances that might indicate increased risk. These trigger events include:

8.1.1. Unusual account activity that deviates significantly from a member's typical transaction pattern.

8.1.2. Transactions that surpass predefined thresholds, internally determined and purposely not shared publicly to avoid criminals from circumnavigating the thresholds.

8.2. By adopting a tiered KYC approach, EWG can efficiently manage risk without compromising the security or the operational efficacy of our investment platform. This method allows us to adapt to the evolving needs of our members and the regulatory landscape.

## **09. Member Responsibilities**

9.1. Members are required to ensure that all information provided to EWG is accurate, complete, and up-to-date. It is the member's responsibility to comply with all applicable regulatory requirements. This includes promptly updating any changes to personal information and adhering to all legal and regulatory frameworks that govern their activities within the private investment club. Members are encouraged to consult with legal or financial advisors to fully understand their obligations under these regulations.

**END OF KNOW YOUR CLIENT (KYC) POLICY**

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