

## **Know Your Customer (KYC) policy**

### **Purpose**

This KYC policy applies to all new and existing customer relationships and to all products and services offered by RSW INVESTMENT GROUP LTD (SWIG Group of Companies). KYC is an ongoing, risk-based process to gather relevant information about our customers and their business and financial activities in order to:

- Facilitate the timely identification of customer activity that is inconsistent with established facts and information. SWIG Group of Companies is committed to deterring the use of its products and services for illegal purposes. The KYC policy and supporting procedures are a key component in the program to prevent and detect money laundering, terrorist financing, fraud and identity theft;
- Meet our legal and regulatory obligations; and
- Gather sufficient information to assist in determining appropriate products and services to meet our customers' financial needs.

### **Confirming Customer Identity**

When establishing a relationship with a customer we will confirm the identity of a person or the existence of an entity within acceptable timeframes using acceptable identification methods. When a product or service is being established, inquiries will be made to determine whether it will be used by or for the benefit of a third party. Where required, particulars of the third party and their relationship with the customer will be obtained prior to establishing the relationship.

### **Collecting and Recording Customer Information**

We will collect and record all pertinent information regarding current and prospective customers including beneficial owners, intermediaries and other interested parties and will establish the purpose and intended nature of each relationship. Where applicable, we will record the type, volume and frequency of expected account activity and we will make enquiries into the source of incoming funds or assets. The extent of such measures will be determined on a risk- sensitive basis depending on the type of customer, business relationship, product and transactions.

### **Verifying Customer Information**

We will take reasonable and appropriate measures to verify the key information provided by prospective customers to reliable independent sources. We will perform additional verification activities for relationships that represent a higher level of risk. We will refuse to enter into or continue relationships or conduct transactions with any person or entity that insists on anonymity or provides false, inconsistent or conflicting information where the inconsistency or conflict cannot be resolved after reasonable inquiry.

## **Monitoring and Updating Customer Information**

We will monitor customer activity to identify and report transactions that may be indicative of illegal or improper activity. We will keep information regarding the customer and their business and financial activities as accurate, complete and up- to-date as necessary to fulfill the purpose for which it was collected. When changes in a customer's financial behaviour become apparent, we will take steps to determine the underlying reasons.

## **Management Responsibilities**

The accountability for confirming identity and recording, verifying and updating customer information resides with management of the business unit where the relationship, product or service is maintained. In special circumstances management may rely on another party, either internal or external to the SWIG Group of Companies, to perform parts of the Know Your Customer process on their behalf. In these cases the basis for such reliance should be documented, including those processes that provide management with reasonable assurance that these responsibilities have been reliably performed. Where reliance is placed on a party external to the SWIG Group of Companies, arrangements should be subject to written agreements that clearly define responsibilities for collecting and verifying customer information. The records of the business unit maintaining the relationship should contain all the information required under this policy.