

# Customer Due Diligence Guidelines

## Interseguro

As part of our Customer Due Diligence (CDD) policies, Interseguro must comply with the following policies and procedures:

### 1. Identification

- Identification of new client's personal information including source of funds, employment status, age and purchasing power at the beginning of the relationship required, by local regulation.
- Additionally, depending on the purpose of the operation, we might request additional information as proof of the source of funds.
- Interseguro requires to identify the ultimate beneficial owner with whom a commercial relationship is established. The beneficial owner is the individual on whose behalf a transaction is being conducted and/or who exercises ultimate effective control over a customer in favor of whom an operation is conducted. It also includes the individual or individuals who effectively control a legal entity.

### 2. Verification

- Interseguro verifies identity to make sure the information is accurate and confirm the clients are not in sanctions lists and assessing risk factors to prevent money laundering, financing of terrorism, fraud and schemes.
- Verification is an automated process that is based on documentation provided by customers, data and information obtained from reliable independent and public sources.
- Interseguro does not accept individuals or business customers that are in the following sanctions lists:
  - Office of Foreign Assets Control (OFAC) List.
  - European Union Terrorism Lists.
  - Lists related to the Financing of the Proliferation of Weapons of Mass Destruction, including, among others, United Nations Sanctions lists.
  - Other lists defined by local authorities.
- Interseguro does not have or maintain anonymous accounts, products and/or services of any kind, as well as with fictitious or inaccurate names, or exclusively with codes.

### 3. Monitoring of operations

Since the monitoring of operations is one of the main mechanisms for the detection of unusual operations carried out by customers, Interseguro has an automated rigorous and robust monitoring system. This includes conducting ongoing due diligence on business relationships and ongoing monitoring of accounts and transactions on a risk based approach.

The AML Officer reports suspicious transactions to the local regulatory authority, based on applicable law and internal policies and procedures. This report must be confidential according to local regulation.

#### **4. Enhanced Due Diligence (EDD)**

In addition to due diligence measures described above, enhance due diligence applies a risk based approach which requires for high-risk and sensitive customers an annual review by the AML Officer, which may involve contacting the customer by phone, email and/or onsite visits.

EDD also includes but is not limited to customer's transaction review, adverse media check, screening sanctions lists and review of supporting documents. An annual review questionnaire must be completed by a PLAFT Analyst and approved by the AML Officer.

The Due Diligence Report prepared is sent to the AML Compliance Officer and his authorization is requested to proceed with the client linkage. Additionally, and for a dual control, the Due Diligence report is sent to the Vice President of Legal, Administration and Finance, in order to validate the linkage.

#### **5. Politically Exposed Person (PEP)**

PEP is defined as an individual who is or has been entrusted with a prominent public function, including heads of state or government, senior politicians, senior civil servants, judges or military officers, senior executives managing public sector companies, important political party officials, among others.

Family members up to second degree of consanguinity and affinity, and close associates are also considered high risk or sensitive customers.

Customers identified as PEP will keep this status indefinitely (once a PEP, always a PEP). As a high-risk or sensitive customer, PEPs are subject to enhanced due diligence procedures. In addition, Commercial Agents are responsible for requesting the customer to provide the names of family members, close associates and all business accounts where the PEP has more than 25% of ownership.