



# AML / KYC / KYB MANUAL

## The Country Bank Of Needham (TCBON)

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 1

TCBON AML / KYC / KYB MANUAL

TCBON AML / KYC / KYB Manual

TCBON AML / KYC / KYB Manual

Consolidated reference manual derived from the three uploaded AML, KYC, and KYB policy documents.

Governance & AML Program

Policy on the Prevention of Money

Laundering / Combatting Terrorism Financing

and

Know Your Business

& Know Your Customer Policy

Contents

1. INTRODUCTION AND BACKGROUND ..... 1

2. COMPANY POLICY ..... 5

3. MONEY LAUNDERING AND TERRORISM FINANCING – DEFINITIONS AND CONCEPTS ..... 5

    3.1. MONEY LAUNDERING..... 5

    3.2. TERRORISM FINANCING ..... 7

    3.3. OTHER DEFINITIONS ..... 7

4. MONEY LAUNDERING REPORTING OFFICER (MLRO) - ROLE AND RESPONSIBILITIES ..... 8



5. KNOW YOUR BUSINESS POLICY - AML RISK ASSESSMENT .....

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 2

..... 9

5.1. PROHIBITED BUSINESS RELATIONSHIPS AND ACTIVITIES .....

..... 9

5.2. RISK-BASED APPROACH .....

..... 9

5.3. RISK CATEGORIES .....

10

5.4. DUE DILIGENCE AND MERCHANT / CONTRACTING PARTY ACCEPTANCE PROCESSES

..... .. 12

5.4.1 BUSINESS RELATIONSHIP ACCEPTANCE

..... 12

5.4.2 CLIENT IDENTIFICATION, IDENTITY VERIFICATION AND DUE DILIGENCE

..... 13

5.4.3. ENHANCED MERCHANT DUE DILIGENCE

..... 16

5.4.4. CLIENT / CONTRACTING PARTY SCREENING

..... 18

5.4.5. BASIC CLIENT / CONTRACTING PARTY DOCUMENTATION

..... 18

5.4.6. CLIENT KYB MONITORING AND REVIEWS

..... 19

5.4.6.1. Relationship Monitoring .....

19

5.4.6.2. Special monitoring on the coupons and the Buyer.....

20

5.4.6.3. Relationship Reviews

..... 21

5.5. END-USER DUE DILIGENCE AND ANTI-FRAUD MEASURES .....

..... .. 22

5.5.1 RISK FACTORS



..... 22

5.5.1.1. Customer Risk Factors  
..... 22

5.5.1.2. Distribution Channel Risk Factors  
..... 22

5.5.1.3. Country or geographical Risk Factors  
..... 22

5.5.2 MEASURES  
..... 22

THE COUNTRY BANK OF NEEDHAM™  
© The Country Bank Of Needham™  
Page 3

5.5.2.1. Business Types  
..... 22

5.5.2.2. Low Risk Business Activity List  
..... 22

5.5.2.2. Medium Risk Business Activity List  
..... 22

5.5.2.3. High Risk Business Activity List  
..... 23

5.5.2.4. Restricted and Prohibited Business Activity List  
..... 23

5.5.3 CUSTOMER DUE DILIGENCE AND ANTI FRAUD MEASURES  
..... 23

5.5.3.1. Enhanced Due Diligence  
..... 24

5.5.3.2. Simplified Due Diligence  
..... 24

6. OBLIGATION TO COOPERATE WITH COMPETENT AUTHORITIES .....  
..... 24

7. MEASURES TO BE TAKEN IN THE EVENT OF A SUSPICION OF MONEY LAUNDERING OR  
TERRORISM FINANCING .....  
25

7.1. MONEY LAUNDERING INDICATORS .....  
.....



..... 26

7.2. MEASURES TO BE TAKEN ..... 27

7.2.1. PRIOR TO ENTERING A BUSINESS RELATIONSHIP ..... 27

7.2.2. IN THE CONTEXT OF AN EXISTING RELATIONSHIP ..... 27

7.3. SENDING A SAR TO THE MLRO..... 28

7.4. FILING A SUSPICIOUS ACTIVITY REPORT ..... 28

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 4

7.5. TIPPING OFF PROHIBITION ..... 29

8. EMPLOYEE TRAINING ..... 29

9. RECORD KEEPING ..... 29

10. SANCTIONS ..... 30

APPENDIX 1 - ESSENTIAL US, EUROPEAN AND INTERNATIONAL REGULATORY REFERENCE TEXTS ..... 31

APPENDIX 2 - LIST OF SENSITIVE COUNTRIES ..... 32

APPENDIX 3 - INDICATORS OF POTENTIAL MONEY LAUNDERING AND/OR TERRORISM FINANCING..... 33

POLICY REVIEW AND MAINTENANCE ..... 37

1. Introduction and background

This Policy on the Prevention of Money Laundering / Combatting Terrorism Financing and Know Your Business & Know Your Customer Policy (hereinafter referred to as the “AML/KYC Policy”, “AML Policy”, or the “Policy”) applies to The Country Bank Of Needham, (“The Country Bank Of Needham”) and aims to prevent and mitigate possible risks of The Country Bank Of Needham being involved in any kind of

illegal activity.

As approved by Authorised Management and the Board of Directors of The Country Bank Of Needham, this policy

applies to all individuals working at all levels within The Country Bank Of Needham, including senior managers, officers,

directors, employees, all external service providers (including consultants), contractors, trainees, homeworkers, part-time and fixed-term workers (all of whom are collectively referred to as "staff").

The AML Policy shall be communicated to all staff and at all times readily accessible, e.g. on the Intranet and/or common drives.

This Policy's main objectives are to:

- Define the principles and measures applied by The Country Bank Of Needham in the fight against money

laundering and terrorism financing ("AML/CFT");

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 5

- Provide guidance and clarify the approach and attitude to be adopted when confronted with money laundering or terrorism financing.
- Comply with applicable AML/CFT laws, regulations and standards, including those applicable to fighting corruption as well as to sanctions and embargoes;
- Ultimately, preserve The Country Bank Of Needham's reputation through limitation and adequate management of AML/CFT risks.

The Country Bank Of Needham acts as platform provider for merchants and payers/customers to perform crypto-

currency payments and instant bank transfers. As a Payment Service Provider, The Country Bank Of Needham does

not

at any stage of the payment chain hold user's funds while solely processing payment transactions.

The Country Bank Of Needham will perform in-dept due diligence on Merchants/Payees and Simplified Due Diligence

on

customers/payees according to Section 5.4 and 5.5.

All the customers have already been through a due diligence process and been approved with

either

the relevant crypto-currency exchange and/or the Banks, where the customer has a crypto-currency wallet and/or a bank account.

The Country Bank Of Needham's AML/KYB processes and procedures will be focused on:

Merchants/Payee, Section 5.4.

Such processes and procedures will cover client / merchant / contracting party on-boarding and due diligence, relationship review and transaction monitoring. Measurements and risk assessment tools will assist The Country Bank Of Needham to on-board and monitor its merchants to prevent

and detect any potential money laundering or terrorist financing activities.

Customers/Payers, Section 5.5.

The Country Bank Of Needham will perform Simplified Due Diligence on the customers side, to minimise risk and

any potential money laundering or terrorist financing activities associated with payments via

The Country Bank Of Needham.

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 6

## 2. Company policy

The AML Policy's main objective is to define the principles and measures applied by The Country Bank Of Needham in

the fight against money laundering and terrorism financing, as well as to provide guidance and clarify the approach and attitude to be adopted when confronted with money laundering or terrorism financing, thereby ensuring that The Country Bank Of Needham adheres to applicable AML laws, regulations

and standards, including those applicable to fighting corruption as well as to sanctions and embargoes.

Prevention of money laundering and terrorist financing is essential to protect The Country Bank Of Needham against

legal consequences, financial loss and reputation damage by managing compliance, regulatory and reputation risks actively, mitigating those risks and thereby seeking to prevent, detect and report suspicions of money laundering. The Country Bank Of Needham intends to offer assurance that The Country Bank Of Needham does not

enter into or maintain business relationships with companies, structures or persons where it

suspects, knows or is reasonably expected to know that they have a criminal background or used for financing terrorism.

The Country Bank Of Needham takes a zero-tolerance approach to money laundering, terrorist activity, and other such financial crimes. Neither commercial considerations nor a sense of loyalty to clients / contracting parties shall be permitted to take precedence over The Country Bank Of Needham's anti-money laundering commitment.

Reputation damage may seriously impact The Country Bank Of Needham as it may lead to unwillingness of clients or professional counterparts to initiate or continue their business relationships with us and may lead to fines or constraints on our business activities imposed by regulators or by any other competent authority.

The AML Policy, taking all current regulatory requirements and standards in terms of the fight against money laundering and terrorism financing into consideration, shall evolve and be updated from time to time to reflect legal and regulatory evolution affecting The Country Bank Of Needham.

This Policy shall be subject to regular controls and verifications according to the money laundering and terrorism financing risks to which The Country Bank Of Needham is exposed.

### 3. Money Laundering and Terrorism Financing – Definitions and Concepts

#### 3.1. Money laundering

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 7

Generally speaking, money Laundering is the process of disguising the origin of the proceeds of crime. Terrorist financing provides funds for terrorist activity. The use of products and services by money launderers and terrorists exposes The Country Bank Of Needham to significant criminal, regulatory and reputational risk.

More precisely, money laundering can be defined as the processing of criminal proceeds (including but not limited to drug trafficking) to disguise their illegal origin or the ownership or control of the assets, or promoting an illegal activity with illicit or legal source funds. Money laundering is

commonly seen as occurring in three steps:

- The first step involves introducing cash into the financial system by some means ("placement");
- The second involves carrying out complex financial transactions to camouflage the illegal source ("layering");
- And the final step entails acquiring wealth generated from the transactions of the illicit funds ("integration").

Some of these steps may be omitted, depending on the circumstances; for example, non-cash proceeds that are already in the financial system would have no need for placement.

Under International law, the money laundering offence is defined as:

- a) Knowingly facilitating the false justification of the origin and nature of an activity, or any direct or indirect proceeds or benefit derived from any of the designated predicate offences (i.e. the deliberate falsification, by whatever means, of the source of property constituting the subject of or the direct or indirect proceeds of or some form of pecuniary advantage drawn from one or more of the designated primary offences);
  - b) Knowingly assisting in a placement, dissimulation or conversion transaction of the activity or any direct or indirect proceeds or benefit derived from one or several predicate offences (i.e. the act of aiding and abetting in the investment, concealment or conversion of property constituting the subject of or the direct or indirect proceeds of or some form of pecuniary advantage drawn from one or more of the designated primary offences);
  - c) Having acquired, held or used the assets underlying the activity, or the direct or indirect proceeds or benefits of any nature whatsoever from one or several of the predicate offences, knowing, at the time they were received, that they originated from one of the designated offences or from the participation in one or several of
- THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 8

these offences (i.e. the act of acquiring, possessing or using property constituting the subject of... in the knowledge at the time of handling that the property originated from committing or taking part in the commission of one or several primary offences).

Money laundering is an offence in its own right, which may be pursued independently from any proceedings or sentences for any of the predicate or primary offences (see definition below). It

should also be noted that a money laundering offence is punishable even a) when only attempted, and b) even when the predicate offence was committed abroad.

The financing of terrorism offence is defined under International law as the unlawful and wilful providing or collecting of funds, securities or assets of any type by any means, directly or indirectly, with the intention that they should be used or in the knowledge that they are to be used, in full or in part, to carry out or attempt to carry out one or more offences defined as acts of terrorism.

A predicate (or primary) offence is an offence the subject or proceeds of which may give rise to the money laundering offence, meaning that money laundering presupposes the existence of an underlying (predicate) offence. Under International law, there is a very wide list of predicate offences, including on the one hand infringements specifically indicated as predicate offences (such as some of the ones listed hereunder) and on the other hand an open list of infringements defined according to a level of seriousness comprising all infringements sanctioned by imprisonment of a minimum higher than 6 months. The list of specifically designated predicate offences contains, mainly, the following:

- Trafficking in drugs and psychotropic substances,
- Participating in a criminal conspiracy or in a criminal organization,
- Kidnapping, illegal restraint and hostage taking,
- Sexual exploitation (prostitution and procuring), including sexual exploitation of minors,
- Trafficking in human beings and illicit trafficking in migrants,
- Illicit arms and ammunition trafficking,
- Public and private corruption,
- Abuse of company assets,
- Counterfeiting, piracy, use and disclosure of trade / manufacturing secrets,
- Counterfeiting of coins and banknotes,
- Theft and other crimes against property,
- Insider trading and market manipulation,
- Terrorism or financing of terrorism,

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 9

- Aggravated tax fraud and tax evasion.

Certain predicate offences generate direct patrimonial advantages (drug trafficking, abuse of corporate assets, etc.) whereas others generate such advantages only indirectly (forgery, use of forgery, etc.).

### 3.2. Terrorism Financing

There can be considerable similarities between the movement of terrorist property and the laundering of criminal property: some terrorist groups are known to have well-established links with organised criminal activity. However, there are two major differences between terrorist property and criminal property. More generally:

- Often only small amounts are required to commit individual terrorist acts, thus increasing the difficulty of tracking the terrorist property;
- Terrorists can be funded from legitimately obtained income, including charitable donations, and it is extremely difficult to identify the stage at which legitimate funds become terrorist property.

### 3.3. Other definitions

For the purpose of this policy, the following definitions shall apply:

a. "Client" or "Merchant" or "Payee" means contracting party with The Country Bank Of Needham providing its

Payment Processing Services to their customers via The Country Bank Of Needham.

b. "Customer" or "Payer" means natural person using the The Country Bank Of Needham Payment Services to pay

for a product / service at the ecommerce web shop.

### 4. Money Laundering Reporting Officer (MLRO) - Role and Responsibilities

The Country Bank Of Needham designates a senior individual to be the Money Laundering Reporting Officer (MLRO),

who is also responsible for The Country Bank Of Needham's Risk & Compliance function. The

MLRO has overall

responsibility for the establishment and maintenance of The Country Bank Of Needham's

AML/KYB/KYC framework

and

underlying systems and controls. The MRLO rep

KYB Framework

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 10

Version 2.0

TCBON KYC/KYB Policy

## Summary

TCBON is committed to maintaining the integrity of its registry by verifying the identity and legitimacy of participants through robust KYB/KYC procedures. We conduct independent sanctions and risk screening, promote transparency in ownership structures, and apply proportionate oversight to prevent misuse of the registry. These measures support accountability, market integrity, and alignment with international best practices.

TCBON KYB/KYC policy v2.0

1 ©TCBON 2026 – All rights reserved

Version 2.0

Date of version 6. March 2026

TCBON KYB/KYC policy v2.0

2 ©TCBON 2026 – All rights reserved

## Purpose

The purpose of this policy is to outline TCBON's commitment to:

- Verifying the identity and legitimacy of organizations and individuals using the TCBON registry;
- Preventing misuse of the registry for fraud, sanctions evasion, misrepresentation, or market abuse;
- Protecting the integrity and credibility of ICCs;
- Supporting transparent governance aligned with international best practice.

For compliance implementation, TCBON may rely on an independent third-party compliance partner,

to conduct screening and integrity checks for automation and efficiency.

## Scope

This policy applies to:

- Project proponents and developers;
- Instrument brokers and traders;
- Validation and verification bodies;
- Authorized representatives;
- TCBON employees, contractors, board members, and interns involved in onboarding or monitoring;
- Third parties conducting screening or integrity checks on behalf of TCBON.

It applies to all registry related activities including:

- Account opening;

- Project registration;
- Issuance of ICCs;
- Transfers within the registry;
- Retirement and cancellation of ICCs.

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 11

Principles

TCBON applies a risk-based and proportionate identity verification framework based on the following

principles:

Legitimacy Verification - TCBON verifies that account holders are legally established entities operating for legitimate purposes.

Transparency - TCBON requires disclosure of ownership and control structures sufficient to identify ultimate beneficial owners (UBOs).

Sanctions Compliance - TCBON ensures that no sanctioned individual or entity may open or maintain

an account.

Proportionality - The depth of review is proportionate to the nature of the entity, jurisdiction, and registry activity.

TCBON KYB/KYC policy v2.0

3 ©TCBON 2026 – All rights reserved

KYB Requirements for Verified Organizations

The following information is required:

- Full legal entity name;
- Registered address;
- Company registration number;
- Country of incorporation;
- Industry sector;
- Directors;
- UBOs ( $\geq 25\%$  ownership or control);
- Authorized representatives.

TCBON will:

- Verify legal existence;

- Screen the entity, directors, and UBOs;
- Assess FATF jurisdictional risk;
- Conduct adverse media checks.

Accounts will not be opened if:

- Sanctions list matches are confirmed;
- The entity is incorporated in a FATF blacklisted jurisdiction;
- Ownership transparency is insufficient.

KYC Requirements for Verified Individuals (Users)

For individual users and authorized representatives:

- Full legal name;
- Government issued identification;
- Proof of authority (if acting for an organization).

Individuals are screened against sanctions and relevant watchlists.

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 12

Sanctions & Risk Screening

TCBON conducts sanctions and risk screening.

Politically Exposed Persons (PEP)

Politically Exposed Persons (PEPs) are individuals who may present higher integrity risk due to their political exposure.

If an account holder, UBO, director, or authorized representative is identified as a PEP, TCBON may:

- Request additional information;
- Conduct further review;
- Apply enhanced monitoring where appropriate.

TCBON KYB/KYC policy v2.0

4 ©TCBON 2026 – All rights reserved

PEP status does not automatically prevent account approval but may result in additional checks.

Sanctions Screening

Account holders, UBOs, directors, and authorized representatives are screened against:

- UN sanctions lists;
- EU sanctions lists;
- UK sanctions lists;

- OFAC (US) sanctions lists.

Screening is performed:

- At onboarding;
- Periodically thereafter;
- When ownership or control changes.

If a confirmed sanctions match is identified account opening will be denied, or the account may be suspended pending review.

TCBON does not permit sanctioned individuals or entities to participate in the registry.

Risk-Based Assessment

Risk factors may include:

- Jurisdiction of incorporation;
- Complex ownership structures;
- High-risk regions;
- Project location risk;
- Material ownership changes.

Where higher risk is identified, enhanced documentation may be requested.

Ongoing Monitoring

TCBON conducts periodic re-screening of:

- Sanctions lists;
- PEP databases.

Updated documentation may be requested where material changes occur.

Data Protection & Confidentiality

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 13

KYB/KYC data:

- Is processed in accordance with GDPR;
- Is retained for a minimum of five (5) years after the most recent registry activity;
- Is stored securely with restricted access.

Data shared with third parties are governed by a data processing agreements ensuring confidentiality and data protection compliance.

TCBON KYB/KYC policy v2.0

5 ©TCBON 2026 – All rights reserved

Non-Compliance & Enforcement

If false, misleading, or incomplete information is provided:

TCBON may:

- Suspend the account;
- Freeze registry activity;
- Deny issuance requests;
- Initiate account closure.

Specific investigative triggers will not be disclosed to avoid compromising screening processes.

#### Policy Review

This policy is reviewed annually or when:

- Sanctions frameworks change;
- FATF lists are updated;
- Screening processes require enhancement.

TCBON KYB/KYC policy v2.0

6 ©TCBON 2026 – All rights reserved

#### Appendix – Document History

Version Date Comment

1.0 21.11.2024 First version.

2.0 6.3.2026 Revisions and clarifications

KYC & AML Operational Controls

Know your business, know your customer & anti-money laundering policies Publication Date:

March, 2024. Approved by The Country Bank Of Needham Date of approval March, 2024 Version

1.0 Frequency of

review and approval Biennially and when required Policy owner Compliance Director Next review

date March 2026 Version: 1.0

#### 1 Purpose

This document contains the Know Your Business (KYB) and Know Your Customer (KYC) policies for

TCBON which outline the principles and procedures for verifying the identity and legitimacy of our customers and suppliers.

TCBON may choose to work with an external partner to deliver these services, and is

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 14

responsible

for the quality of the process and for the purposes of this document, we use the word TCBON even if the checks would be conducted by our subcontractor.

These policies are implemented by the Compliance Director.

## 2 Know Your Business and Anti-Money Laundering

Know Your Business (KYB) and Anti-Money Laundering (AML) is the process of verifying the identity and legitimacy of the businesses who seek to join TCBON as suppliers or buyers of CO2 Removal Certificates (CORCs). KYB aims to ensure that TCBON only works with businesses that

have a genuine interest and capability to produce or purchase negative carbon emissions, and that are not involved in any illegal or unethical activities.

TCBON applies the following KYB procedures for its customers and suppliers:

- **Registration:** The business must provide information such as the name, registered address, company identification number, contact details, and website of the company, as well as the name and email of the person who will act as the main contact for TCBON. This person will be subject to an additional KYC process (see section 3).
- **Verification:** The business must provide proof of identity and legal status depending on the applicability per country, such as a copy of the business registration certificate, tax identification number, articles of association, and other relevant documents. TCBON may also request additional information or documents to verify the nature and scope of the business, such as the annual report, financial statements, environmental impact assessment, or third-party certifications.
- **Screening:** The business must undergo a screening process to check whether it is subject to any sanctions, restrictions, or adverse media coverage that may affect its eligibility or suitability to join the TCBON ecosystem. TCBON may use external sources or databases to conduct the screening, such as the European Union's sanctions list, the United Nations' consolidated list, or the World-Check database.
- **Approval:** The business must receive a formal approval from TCBON before it can start issuing and managing CORCs on the platform. TCBON reserves the right to reject any application that does not meet its KYB criteria or standards, or that poses a potential risk to its reputation or operations.
- **Monitoring:** TCBON monitors the organizations that have gone through the KYB process to ensure they are not entered to global sanctions lists and that their representatives are not on Politically Exposed Person (PEP) screening lists. If such event occurs, a representative of Puro will reach out to the organization and initiate contract termination procedure.

### 3 Know Your Customer

Know Your Customer (KYC) is the process of verifying the identity and legitimacy of the individuals who act as the representatives or agents of the businesses that join TCBON as suppliers or THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

Page 15

buyers of CORCs. KYC aims to ensure that TCBON only works with individuals who have the proper authorization and capacity to act on behalf of their businesses, and that are not involved in any illegal or unethical activities.

TCBON applies the following KYC procedures:

- **Identification:** The individual must provide basic information such as the name, email, phone number, and position of the person who will act as the main contact for TCBON.
- **Authentication:** The individual must provide proof of identity and authorization, such as electronic authentication and identity, a copy of the passport, driver's license, or national identity card, as well as a letter of authorization or power of attorney from the business that grants the individual the right to act on its behalf unless it is stated in the business registration certificate of the organization.
- **Screening:** The individual must undergo a screening process to check any sanctions or restrictions that may affect eligibility or suitability. TCBON may use external sources or databases to conduct the screening, such as the European Union's sanctions list, the United Nations' consolidated list, or the World-Check database.
- **Approval:** The individual must receive a formal approval from TCBON before an account can be opened on the platform. TCBON reserves the right to reject any application that does not meet its KYC criteria or standards, or that poses a potential risk to its reputation or operations.

TCBON also expects its customers and suppliers to inform it of any changes or updates in their information or status that may affect their eligibility or suitability to join or remain on the platform.

### 4 Implementation

TCBON continuously monitors the status of Account Holders on the TCBON platform.

TCBON may suspend or terminate the account of any customer or supplier that fails to comply with its KYB and KYC policy and procedures, or that provides false, misleading, or fraudulent information or documents.

### 5 Review and updates

TCBON monitors and reviews its KYB and KYC policy and procedures at least biennially to

ensure

that they are effective, efficient, and compliant with the applicable laws and regulations. In the interim, TCBON may update or amend its KYB and KYC policy and procedures at any time, and will notify its customers and suppliers of any changes or requirements.

## 6 Training

TCBON is committed to providing adequate and appropriate training to all relevant people in the organization on its KYB and KYC policy and procedures. The Compliance Director ensures that the training ensures compliance and understanding of the purpose, scope, and implementation of the policies, as well as the roles and responsibilities of the staff involved. The training also covers the legal and regulatory framework governing the KYB and KYC requirements, the risks and

THE COUNTRY BANK OF NEEDHAM™

© The Country Bank Of Needham™

## Page 16

consequences of non-compliance, and the best practices and standards for conducting due diligence and verification checks.

The training is tailored to the different levels and functions of the staff, depending on their exposure and involvement in the KYB and KYC process. For example, the frontline staff who interact directly with the customers and suppliers, such as the sales and marketing team, are required to undergo more in-depth and frequent training, as they are responsible for collecting and verifying the information and documents from the customers and suppliers. They are also trained on how to identify and report any suspicious or unusual activities or transactions that may indicate fraud, money laundering, or other criminal activities.