Customer Due Diligence (KYC) Program

Compliance Program | Global

Version 2.0 · July 2026 · Confidential — Internal Use

This document is a template intended to be reviewed, tailored and approved by your organisation before use.
Replace all references to “the Company” with your organisation’s name.

Document Control

Document name	Customer Due Diligence (KYC) Program
Document type	Compliance Program
Jurisdiction	Global
Owner	Chief Compliance Officer / AML/CFT Compliance Officer
Approved by	Board of Directors
Version	2.0
Effective date	July 2026
Review cycle	Annual
Next review due	July 2027
Classification	Confidential — Internal Use

Contents

1. Purpose

This Program sets out the customer due diligence (CDD) and know-your-customer (KYC) measures the Company must apply before establishing a business relationship or carrying out an occasional transaction, and thereafter for the life of each customer relationship. It specifies what identification information must be collected for each customer type, how that information must be verified, how beneficial owners, politically exposed persons and agents acting for customers are identified and assessed, when simplified and enhanced due diligence apply, the conditions for reliance on third parties, and the records that must be kept. It implements FATF Recommendations 10, 11, 12, 17 and 22 and reflects the Basel Committee guidelines on the sound management of ML/TF risks and Wolfsberg Group standards.

The Company must not establish a business relationship or carry out an occasional transaction unless it has first established, on reasonable grounds, that the customer is who they claim to be and has understood who ultimately owns and controls the customer and why the customer seeks the relationship. This Program exists to make that obligation operable: it converts the international standard into specific collection and verification requirements, decision rules, escalation paths and record-keeping requirements that staff can apply consistently across all products, channels and jurisdictions.

This Program is a companion to the Company's AML/CFT Program, which contains the enterprise ML/TF risk assessment, the customer risk-rating methodology, governance arrangements, transaction monitoring and suspicious activity reporting framework. Governance, oversight and reporting obligations established in the AML/CFT Program are not duplicated here; where this Program refers to a customer risk rating or to the enterprise risk assessment, it refers to those produced under the AML/CFT Program. This Program is approved by the Board of Directors on the recommendation of the [Board Risk and Compliance Committee] and is owned and maintained by the Chief Compliance Officer / AML/CFT Compliance Officer.

2. Scope

This Program applies to the Company and to each subsidiary and branch through which the Company provides financial products or services [list in-scope entities], and to all directors, employees, contractors and agents of the Company who onboard customers, verify identity, approve exceptions or design onboarding processes and systems. Consistent with the Basel Committee guidelines, the Program applies on a group-wide basis: each branch and majority-owned subsidiary must apply these measures, or stricter local requirements, and must share CDD information within the group to the extent permitted by applicable law.

It applies to every financial product and service the Company provides, across all channels through which customers are onboarded or serviced, including branch,

broker and intermediary, telephone, internet and mobile application channels, and to all customer types: individuals, sole traders and other unincorporated businesses, companies and other legal persons, trusts and other legal arrangements, partnerships, associations, foundations and other non-profit organisations, co-operatives and government bodies.

This Program covers initial and ongoing customer due diligence: the identification and verification of customers, their beneficial owners and their agents before a business relationship is established or an occasional transaction above the applicable threshold is carried out; the maintenance of that information; and re-verification where a trigger event occurs. The following related matters are governed by other documents and are out of scope: the enterprise ML/TF risk assessment, customer risk-rating methodology, transaction monitoring and suspicious activity reporting (AML/CFT Program); sanctions screening operations and hit management (Sanctions Policy); correspondent banking due diligence (Correspondent Banking Policy); and fraud investigation (Fraud Risk Management Policy).

Jurisdictional application: this Program states international best practice anchored to the FATF Recommendations and related standards. The Company must map the requirements of this Program to the law of each jurisdiction in which it operates, including local definitions, thresholds, registry obligations and identification document standards, and where the law of a jurisdiction imposes a stricter or additional requirement, that law prevails. Where local law prevents the application of any measure in this Program, the Chief Compliance Officer / AML/CFT Compliance Officer must be informed by the senior manager accountable for the affected branch or subsidiary within [5] business days of the constraint being identified, and must determine, document and apply appropriate additional measures within a further [10] business days. Where those measures cannot bring the residual risk within the Company's risk appetite, the Chief Compliance Officer / AML/CFT Compliance Officer must report the matter to the [Board Risk and Compliance Committee] at its next meeting, and the Committee must decide whether the affected products, channels or customer types are to be restricted or discontinued.

3. Definitions

Term	Definition
Beneficial Owner	The natural person or persons who ultimately own or control a customer, directly or indirectly, including through holding [25]% or more of the ownership interests or voting rights (or any lower threshold prescribed by applicable local law), any person who otherwise exercises ultimate effective control over the customer, and any person on whose behalf a transaction is conducted.
Business Relationship	A relationship between the Company and

	a customer that is expected, at the time it is established, to have an element of duration, including the opening of an account, the grant of a facility or the provision of an ongoing service.
Certified Copy	A copy of an original document certified as a true copy of the original by a person authorised to do so under the law or accepted practice of the relevant jurisdiction, such as a notary public, lawyer, accountant who is a member of a recognised professional body, or an official of a regulated financial institution.
Customer	A natural person, legal person or legal arrangement to whom the Company provides, or proposes to provide, a financial product or service, whether through a business relationship or an occasional transaction, including account holders, signatories, borrowers, depositors, and parties to payment, remittance or value transfer transactions.
Customer Due Diligence (CDD)	The measures by which the Company identifies a customer and verifies its identity using reliable and independent sources, identifies and takes reasonable measures to verify beneficial owners, understands the ownership and control structure and the purpose and intended nature of the business relationship, and keeps that understanding current through ongoing monitoring, consistent with FATF Recommendation 10.
Digital Identity System	A system that covers the proofing, enrolment, credentialing and authentication of a person's identity by electronic means, assessed against recognised assurance frameworks consistent with the FATF Guidance on Digital Identity.
Enhanced Due Diligence (EDD)	More intensive due diligence measures applied beyond the standard requirements where the money laundering, terrorism financing or proliferation financing risk of a customer, counterparty, transaction, relationship or other party is assessed as high, or where a mandatory trigger arises, including additional verification, establishment of source of funds and source of wealth, senior management approval and enhanced ongoing

	monitoring.
Financial Intelligence Unit (FIU)	The national agency in each jurisdiction in which the Company operates that acts as the central authority for receiving, analysing and disseminating suspicious transaction reports and other information relevant to money laundering, associated predicate offences, terrorism financing and proliferation financing, consistent with the FATF Recommendations.
Legal Arrangement	An express trust or other similar arrangement, such as a fiducie, treuhand or waqf, in which legal ownership and beneficial interest are separated.
Legal Person	An entity other than a natural person that can establish a customer relationship or own property, including companies, bodies corporate, foundations, partnerships with legal personality, associations and co-operatives.
ML/TF Risk	The risk that the Company's products, services, customers, delivery channels or the jurisdictions in which it operates may be used to facilitate money laundering, terrorism financing or proliferation financing.
Occasional Transaction	A transaction carried out for a customer outside a business relationship, whether as a single operation or several operations that appear linked, including occasional wire transfers.
Politically Exposed Person (PEP)	An individual who is or has been entrusted with a prominent public function, whether domestically, in a foreign country or by an international organisation, together with that individual's immediate family members and close associates, classified as domestic, foreign or international organisation PEPs consistent with the FATF standards.
Reliance Arrangement	A documented arrangement under which the Company relies on a third party that is regulated, supervised and subject to CDD and record-keeping requirements consistent with the FATF Recommendations to perform elements of CDD, on the conditions set out in the Reliance on Third Parties section of this Program.
Simplified Due Diligence (SDD)	The reduced set of CDD measures that the

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.

finance-policies.com