

Client Onboarding Policy

Effective from 1 January 2026

Best Wing Global

Company Number: GB25205695

Authorized and Regulated by the Financial Services Commission of
Mauritius (FSC)

1. Purpose

This Client Onboarding Policy outlines the procedures and controls implemented by BestWing Global (“BWG”, “the Company”, “we”, or “our”) to ensure that all clients are onboarded in a secure, compliant, and transparent manner.

The objective of this policy is to:

- Ensure compliance with applicable Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations.
- Verify the identity of all clients prior to establishing a business relationship.
- Assess client suitability and risk profile.
- Prevent BWG services from being used for financial crime, fraud, or illicit activities.

This policy applies to all employees, contractors, and representatives involved in client onboarding.

2. Scope

This policy applies to:

- Individual clients
- Corporate entities
- Institutional clients
- Any individual or entity seeking to open or maintain an account with BWG.

All clients must complete the onboarding process and pass the required verification checks before gaining access to BWG services.

3. Client Identification Requirements

BWG implements a Know Your Customer (KYC) process to verify each client's identity before account activation.

3.1 Individual Clients

Individual clients must provide the following:

Proof of Identity (POI)

One of the following valid government-issued documents:

- Passport
- National ID card
- Driver's license

The document must:

- Be valid and not expired
- Display the client's full name
- Include date of birth
- Include a clear photograph
- Be clearly readable

Proof of Address (POA)

One of the following documents issued within the last 3 months:

- Utility bill
- Bank statement
- Government-issued correspondence
- Tax document

The document must display:

- Client's full name
- Residential address
- Issue date
- Issuing institution

5. Sanctions and PEP Screening

All clients are screened against:

- Global sanctions lists
- Politically Exposed Person (PEP) databases
- Adverse media sources
- Financial crime watchlists

BWG reserves the right to:

- Reject any onboarding request
- Request additional documentation
- Conduct further investigation

Clients appearing on sanctions lists will not be onboarded.

3.2 Corporate Clients

Corporate entities must provide:

- Certificate of Incorporation
- Memorandum and Articles of Association
- Register of Directors
- Register of Shareholders
- Proof of business address
- Identification documents for directors and ultimate beneficial owners (UBOs) holding 25% or more ownership

BWG may request additional documentation where necessary.

4. Risk Assessment

Each client undergoes a risk-based assessment during onboarding.

Factors considered include:

- Country of residence
- Source of funds
- Nature of trading activity
- Client occupation or business activities
- Politically Exposed Person (PEP) status
- Sanctions screening results

Clients will be classified as:

- Low Risk
- Medium Risk
- High Risk

High-risk clients may require Enhanced Due Diligence (EDD) before approval.

6. Source of Funds Verification

BWG may request evidence of a client's source of funds or wealth, particularly in cases involving:

- Large deposits
- High-risk jurisdictions
- Unusual trading patterns
- High-risk client classifications

Examples of acceptable documentation include:

- Bank statements
- Employment verification
- Business income records
- Investment statements

7. Ongoing Monitoring

Client relationships are subject to continuous monitoring after onboarding. BWG monitors:

- Trading activity
- Deposit and withdrawal patterns
- Changes in risk profile
- Suspicious transactions

Where necessary, BWG may request updated KYC documentation or conduct additional reviews.

8. Account Approval Process

Client accounts may only be activated after:

1. Submission of required documentation
2. Successful identity verification
3. Completion of sanctions screening
4. Risk assessment approval

BWG reserves the right to decline onboarding without providing specific justification where risk concerns arise.

9. Record Keeping

BWG maintains client onboarding records in accordance with regulatory requirements. Records include:

- Identification documents
- Verification results
- Risk assessments
- Communication records

All records are retained for a minimum of five (5) years following the termination of the business relationship, or longer where required by law.

10. Data Protection

BWG is committed to protecting client information. All client data collected during onboarding is:

- Processed securely
- Stored in protected systems
- Used solely for regulatory and operational purposes

BWG complies with applicable data protection and privacy regulations.

11. Training and Compliance

Employees responsible for onboarding must receive ongoing AML/KYC training to ensure compliance with this policy.

The Compliance Department is responsible for:

- Oversight of onboarding procedures
- Periodic policy review
- Ensuring regulatory compliance

12. Policy Review

This Client Onboarding Policy will be reviewed periodically and updated when necessary to reflect:

- Regulatory changes
- Operational developments
- Risk management improvements



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