

CUSTOMER ACCEPTANCE POLICY
Alisium B.V. (Reg. number 161507)

Version Control

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The Company shall not enter into a business relationship with the Client if:

- 1) The Client is younger than 18 years old or as maybe alternatively determined by the Client's citizenship.
- 2) The Client acts on behalf of or represents any third party
- 3) The Client is a legal entity, and not the natural person end user of the services
- 4) The Client is unable to comply with the CDD/EDD requirements;
- 5) It is known that the Client is or has been involved in ML/FT/PF or Sanctions breaches stories
- 6) The Client is resident of a restricted country
- 7) The Client is a Sanctioned Individual
- 8) The client was included in the Company's internal blacklist.
- 9) The Company is not satisfied that the purpose and nature of the business relationship are legitimate, or the risk posed by the Client falls within an unacceptable risk level, which means that the Client would require too many resources to effectively manage the ML/FT/PF risk

All the client categories mentioned above fall into unacceptable risk categories and service for those shall be declined. If at some point of time the Company determines that such a business relationship already exists, the Company shall terminate it and suspend transactions until it can be terminated, subject to instructions from the authorities, where applicable.

There are risk factors, which automatically lead to the Client be assessed as high risk, such as:

- Politically Exposed Persons and their Relatives and Close Associates;
- Clients with links to high risk jurisdictions;
- Clients, whose overall risk is determined to be high based on multiple factors;
- Clients, who use products or payment methods that might favor anonymity; clients, who use new products, which might have heightened ML/TF/PF risks.

For such clients EDD procedure shall be applied as described in detail in Section 18 of the AML Policy.

As described further in Section 11 Risk Management and Client Risk Assessment of the AML Policy, by default all other clients initially are deemed low risk but are constantly monitored to ensure the risk remains low. Otherwise risk categories shall be revised and further CDD or EDD measures based on the new risks determined to be applied as described in detail further in this Policy.

For low risk clients CDD measures as described further in Section 12 of the AML Policy are applied. Medium risk clients are also subject to CDD measures, however, based on determined risk factors, some additional measures may be applied. EDD measures are mandatory for all high risk clients. Please refer to Sections 20 and 21 of the AML Policy for details on level of ongoing monitoring and periodic review regularity to be applied based on the Client risk category assigned.

The Company has developed the Client Risk Assessment form, which is included as Annex 3 to this Policy and is regularly reviewed and updated. This form contains information on the specific ML/FT/PF risk factors and their level (low/medium/high) to which the Company is exposed to by cooperating with a specific Client.