



Optima Asset Financial Services LLC

Know Your Client (KYC) Policy

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1. Introduction

At Optima Asset LLC, we are committed to maintaining the highest standards of integrity, transparency, and compliance in all our business operations. This Know Your Client (KYC) Policy is a cornerstone of our compliance framework, ensuring that we understand our clients and investors thoroughly while adhering to regulatory requirements.

The KYC process helps us mitigate risks such as fraud, money laundering, and terrorist financing. It also enables us to tailor our services to meet the unique needs and objectives of our clients.

2. Scope

This policy applies to all individuals, entities, and counterparties engaging with Optima Asset LLC, including but not limited to:

- Individual investors
- Corporate investors
- Trusts, foundations, and partnerships
- Intermediaries and financial institutions

The policy covers the collection, verification, and ongoing monitoring of non-sensitive client and investor information.

3. Objectives

The primary objectives of this KYC Policy are:

- **Client Identification:** To accurately identify and verify the identity of all clients and investors.
- **Risk Assessment:** To understand the nature of clients' activities, financial situations, and investment objectives to assess associated risks.
- **Regulatory Compliance:** To comply with applicable laws, regulations, and industry standards, including anti-money laundering (AML) and counter-terrorism financing (CTF) requirements.
- **Ongoing Monitoring:** To ensure that client information remains up-to-date and to detect any unusual or suspicious activities.

4. Governance and Responsibility

The Compliance Officer at Optima Asset LLC is responsible for overseeing the implementation and enforcement of this KYC Policy. All employees are required to adhere to this policy and report any discrepancies or concerns to the Compliance Officer.

5. Information Required

To fulfill KYC requirements, Optima Asset LLC collects the following non-sensitive information from clients and investors:

5.1. Personal Information: (for Individual Investors)

- Full Name: Legal name as per government-issued identification.
- Date of Birth: To verify age and identity.
- Nationality: To determine jurisdictional requirements.
- Residential Address: Verified through utility bills or bank statements.
- Contact Information: Phone number and email address for communication.
- Occupation and Employment Details: To understand the source of income.
- Source of Funds: To ensure legitimacy of funds used for investments.
- Financial Situations and Instruments: Details of income, assets, liabilities, and existing investment holdings.

5.2. Entity Information: (for Corporate Investors)

- Legal Name of Entity: As per registration documents.
- Registered Address: Official address of the entity.
- Business Address: Primary place of business operations.
- Type of Entity: Corporation, partnership, trust, or other legal structures.
- Date of Incorporation: To verify the entity's existence.
- Registration Number: Unique identifier from the relevant regulatory authority.
- Financial Situations and Instruments: Revenue, assets, liabilities, and investment portfolios.
- Nature of Business: To understand the entity's primary activities.
- Ownership Structure: Details of beneficial owners holding 10% or more of the entity.
- Authorized Signatories and Directors: Individuals authorized to act on behalf of the entity.

5.3. Investment Information:

- Investment Objectives: Growth, income, diversification, or other goals.
- Expected Investment Horizon: Short-term, medium-term, or long-term.
- Source of Investment Funds: To ensure transparency and legitimacy.
- Previous Investment Experience: To understand the client's familiarity with financial markets.

6. Verification Process

Optima Asset LLC employs a robust verification process to ensure the accuracy and authenticity of client information. This includes:

- **Documentary Verification:** Government-issued IDs, passports, or driver's licenses for individuals; certificates of incorporation and articles of association for entities.
- **Address Verification:** Utility bills, bank statements, or lease agreements.
- **Database Checks:** Cross-referencing information with publicly available databases and regulatory filings.
- **Third-Party Verification:** Engaging reputable third-party services for additional checks, if necessary.

7. Record Keeping

Optima Asset LLC maintains comprehensive records of all client and investor information collected during the KYC process. These records include:

- Copies of identification documents.
- Proof of address.
- Corporate documents for entities.
- Financial and investment information.

Records are stored securely in both physical and electronic formats, with access restricted to authorized personnel only. All records are retained for a minimum period of 1 year or as required by applicable laws and regulations.

8. Confidentiality

Client and investor information is treated with the utmost confidentiality. Optima Asset LLC adheres to strict data protection protocols to safeguard sensitive information. Information is used solely for the purposes of:

- Fulfilling KYC obligations.
- Complying with regulatory requirements.
- Providing tailored financial services.

No client information is shared with third parties without explicit consent.

9. Data Security

To protect client information, Optima Asset LLC implements the following measures:

- Encryption of electronic records.
- Secure access controls and authentication mechanisms.
- Regular audits and monitoring of data security practices.
- Employee training on data protection and confidentiality.

10. Compliance and Review

This KYC Policy is reviewed annually or as needed to ensure compliance with evolving regulatory requirements. Updates are communicated to all relevant stakeholders, and employees are trained on any changes.

11. Ongoing Monitoring

Optima Asset LLC conducts ongoing monitoring of client accounts and activities to:

- Ensure client information remains accurate and up-to-date.
- Reassess risk profiles as necessary.

13. Client Acknowledgment

By engaging with Optima Asset LLC, clients and investors acknowledge that they have read, understood, and agreed to comply with this KYC Policy. Clients are required to provide accurate and complete information and to notify Optima Asset LLC of any changes to their personal or financial circumstances.

Optima Asset Financial Services LLC

Incorporated in the United States (Registration no. 299826) Authorised
and regulated by the United States Securities and Exchange
Commission (Licence no. 801-115262)

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