

[ADD THIS DOCUMENT TO THE KYC FILE OF EVERY CLIENT]

NAME CLIENT: .....

- **THE CLIENT PROVIDED ALL KYC<sup>1</sup> INFORMATION AND IDENTIFICATION DOCUMENTS OF HIMSELF/HIS COMPANY (BYLAWS, IDENTITY CARDS, NAMES UBO'S<sup>2</sup> , ..) AND ANSWERED ALL RISK ASSESSMENT RELATED QUESTIONS<sup>3</sup>:**

- YES
- NO: ..... [EXPLAIN]

- **AFTER ANALYSING ALL RECEIVED INFORMATION AND PERFORMING A RISK ASSESSMENT<sup>4</sup> ON THE CLIENT:**

- NO RISKS WERE IDENTIFIED
- THE FOLLOWING RISKS WERE IDENTIFIED: ..... <sup>5</sup>

- **BASED ON ALL THE ABOVE, MY COMPANY DECIDES TO:**

- ACCEPT THE CLIENT
- REJECT THE CLIENT: ..... [MENTION IF A NOTIFICATION TO THE BELGIAN FIU<sup>6</sup> WAS MADE]

SIGNATURE ANTI-MONEY LAUNDERING OFFICER

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<sup>1</sup> Know Your Customer

<sup>2</sup> Ultimate Beneficial Owners

<sup>3</sup> The company may use the AWDC client letter and ask additional questions to obtain all necessary information from the client

<sup>4</sup> The company may consult Bureau Van Dijk and various sources of information (Google, references from other traders, ..) to perform a risk assessment

<sup>5</sup> Non-limitative list of examples: the client (or family member) is a politically exposed person (PEP), the client is sanctioned, the client insists on cash payments (above the minimum threshold), the client is active in a sector where the purchase or sale of diamonds does not logically fit in its corporate purpose, the client insists on atypical payment methods, the client is located in a high risk country, the client is connected to negative media, the client can not explain why he wishes to purchase diamonds or what kind of business relationship he pursues, the client wishes to purchase diamonds via a third party, the identification details which the client provided are not official or do not look authentic or are not up-to-date nor complete, the client has a complex company structure, the client has a history of bankruptcy, the client wants to execute a complex or unconventionally big transaction which does not have a visible economic or legitimate purpose, the client is a Belgian diamond company but not registered with the FPS Economy, ...

<sup>6</sup> Financial Intelligence Unit