

CLIENT ONBOARDING APPROVAL PROCEDURES

Before seeking Compliance Department's approval, all CROs are required to follow the procedure below:

1. The CRO is to prepare and sign the minutes of meeting where the CRO discussed the engagement to be undertaken. The CRO is encouraged to have face-to-face meetings with the client. Where face-to-face meetings are not possible, the CRO must at least have a video conference with the client to confirm the identity of the client (by comparing against passport photo). At the meeting or during the video conference, the CRO is to obtain confirmation of the email address of the client for e-signature via HelloSign.
2. The CRO is required to conduct a preliminary evaluation to determine the risk of onboarding the client based on **i)** his profile and **ii)** the type(s) of service(s) requested of Healy Consultants and **iii)** the country where the client is from, resident in/operates in or wishes to conduct business/service in.
3. Upon determining the risk profile of the client, the Risk Assessment profile of the client must be saved in the Client Folder. Prepare the preliminary Due Diligence Checklist (DD Checklist) in accordance with the client risk profile.
4. Send the DD Checklist you have prepared and populated accordingly based on the due diligence documents you have already received from the client to the Compliance Department. Compliance Department will determine whether the contents of the DD Checklist is suitable and may customise the DD Checklist if more or alternative documents/information are required.
5. At the same time, the CRO is also required to send to the Compliance Department for approval the amendments the client may have made to the Engagement Letter.
6. The CRO must have secured 100% of the due diligence documents from the client within 14 calendar days of engagement commencement although all CROs are encouraged to obtain 100% of the due diligence documents before commencing the engagement or accepting payment. Where the client requires a little more time to secure all the due diligence documents, the CRO is to obtain at the very least copies of passport and/or company incorporation documents and then inform the Compliance Department, who will advise the CRO which documents must be obtained first and the timelines within which the documents must be obtained. All CROs to note that **ALL** due diligence documents must be secured within 14 calendar days of the commencement of the engagement. Engagement Commencement occurs upon receipt of the signed engagement letter or receipt of payment for engaging Healy Consultants services.
7. There is no need for hardcopy documents, softcopies are sufficient and where necessary electronic signature via HelloSign will suffice as proof of signature (please refer to paragraph 1 above to confirm email address of person who is to e-sign the documents in a face-to-face meeting or video conference).

8. The Client may be onboarded and invoiced **i)** once the Compliance Department has approved client's due diligence documents, **ii)** the relevant approvals in the table at paragraph 10 have been obtained and **iii)** the client file has been opened.

Who needs to approve the Client?

9. To determine the approval levels, the CRO should consider the service(s) requested by the client and the client's profile. For guidance CRO, should refer to the tables below. For clients requesting multiple services, CRO is to identify the service with the highest risk and apply that as the overall risk-indication for the potential engagement. When CRO is unsure, CRO should consult with Compliance or their supervisor/senior management.

Services	Risk level
Company formation services without nominee services	Low risk
Company incorporation with nominee service to comply with government rules	Low risk
Nominee services for reasons other than complying with government rules	High risk
Corporate bank account opening services without company formation	Medium risk
Company secretary services	Low risk
Registered address or virtual office services	Low risk
Accounting and tax services	Low risk
Advisory services (e.g. retainer fee research)	Low risk

Client profile	Risk level
Use the risk calculator available on this page	Use risk calculator
<i>When it is too early to use risk calculator, use the below criteria:</i>	
Listed company	Low risk
Client(s) plans to be the director, shareholder and bank signatory of the entity	Low risk
Client is using one holding company	Low risk
Client is using multiple layers of holding companies but all of them are registered in countries with public company's registrars	Medium risk
Client is using multiple layers of holding companies and at least one of them is registered in a country with no public companies' registrars	High risk
Client with high risk business nature (e.g. SVF, security service)	High risk
Client has negative information online (e.g. tax evasion, financial fraud)	High risk

Client is not transparent	High risk
Client refuses to give due diligence information	High risk

10. In accordance with the risk levels, each of the persons/departments approvals must be sought:

Client risk level Service risk level	Low risk	Medium risk	High risk
Low risk	Approval by: 1) Compliance	Approval by: 1) Compliance	Approval by: 1) Compliance 2) Regional CEO
Medium risk	Approval by: 1) Compliance	Approval by: 1) Compliance 2) Regional CEO	Approval by: 1) Compliance 2) Regional CEO 3) Chairman
High risk	Approval by: 1) Compliance 2) Regional CEO 3) Chairman	Approval by: 1) Compliance 2) Regional CEO 3) Chairman	Approval by: 1) Compliance 2) Regional CEO 3) Chairman