



CORPORATE COMPLIANCE POLICY

Buyer Know Your Customer (KYC) Policy

Company	Africa Global Trade Link Ltd
Country	Rwanda
Effective Date	[Insert Date]
Version	1.0
Review Cycle	Annual, or when required by regulatory/compliance changes
Approved By	[Managing Director / Authorized Director]

"We connect. We facilitate. We create opportunities."

1 PURPOSE

This Buyer KYC Policy establishes a structured process for identifying, verifying, screening, and assessing prospective buyers before Africa Global Trade Link Ltd ("AGTL") facilitates a commercial introduction, sourcing opportunity, brokerage transaction, or other business relationship. AGTL connects qualified buyers, sellers, suppliers, manufacturers, distributors, and commercial partners across African and international markets.

The process is intended to:

- Protect AGTL and its commercial partners from fraud and misrepresentation
- Verify the identity, legal existence and business activity of prospective buyers
- Identify individuals authorized to act on the buyer's behalf and understand its purchasing requirements
- Identify sanctions, compliance, corruption, fraud, or reputational risks
- Reduce the risk of fictitious companies, unauthorized representatives, or bad-faith counterparties
- Support transparent, responsible international trade

2 SCOPE

This policy applies to prospective buyers introduced to or sourced by AGTL across its seven strategic business pillars: minerals & metals, machinery & heavy equipment, vehicles & transport, industrial products, commodities & raw materials, procurement & sourcing, and brokerage / market-access services.

It applies whether the buyer is a company, manufacturer, distributor, wholesaler, trader, importer, exporter, government-related commercial entity, project developer, investment company, special-purpose vehicle, or other legally established commercial organization.

3 KYC PRINCIPLE — A RISK-BASED APPROACH

Not every buyer presents the same level of risk. The depth of verification depends on factors including:

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|--------------------------------------|---------------------------------|---------------------------------|
| ● Country of incorporation/operation | ● Ownership & payment structure | ● Reputation & source of funds |
| ● Product involved | ● Regulatory requirements | ● Complexity of transaction |
| ● Transaction value | ● Sanctions exposure | ● Nature of the buyer's mandate |

Higher-risk transactions may require Enhanced Due Diligence (EDD) before AGTL proceeds.

4–9 BUYER INFORMATION & VERIFICATION

Prospective buyers complete a Buyer KYC & Corporate Information Form and provide supporting documentation across the following areas:

Corporate Information ● Legal name, registration no. & date/country of incorporation ● Registered office & business address ● Nature of business, products & countries of operation ● Tax ID and relevant business licences	Company Registration ● Current registration document verified against official registries ● Confirms legal existence, directors, and company status
Beneficial Ownership (UBO) ● Full legal name, nationality, ownership % and position ● Ownership/control chart for complex structures ● Relationship may be suspended if UBO cannot be established	Authorized Representative ● Passport/ID, job title, letter of authorization, board resolution ● Never relies solely on WhatsApp, Telegram, Gmail or social media
Buyer Mandate (Intermediaries) ● Confirms product, quantity, destination, validity & authority granted ● AGTL may seek direct confirmation from the principal buyer	Commercial Requirement ● Product, specifications, quantity, quality, Incoterms, price mechanism ● Delivery schedule, documentation & end-use information

10–15 FINANCIAL CAPACITY & SCREENING

Financial Capacity & Banking

AGTL may request reasonable evidence of financial capacity (bank reference, proof of funds, financial statements) proportional to transaction size and risk. Banking details are collected only when necessary and handled confidentially — AGTL never requests passwords, PINs, or online banking access.

Sanctions, Watchlist & Adverse Media Screening

Buyers, directors, beneficial owners and representatives may be screened against sanctions, restricted-party and watchlist databases, plus reasonable checks for credible adverse media (fraud, money laundering, corruption, trade or sanctions violations). Confirmed or unresolved material concerns may lead AGTL to decline or suspend the relationship.

Source of Funds / Wealth & Product Due Diligence

For higher-value or higher-risk transactions, AGTL may request source-of-funds and source-of-wealth information, and — for controlled or sensitive products — end-use, licensing, and destination documentation.

16 RISK CLASSIFICATION

LOW	Normal commercial activity, transparent ownership, verifiable information, no material concerns.
MEDIUM	Unusual ownership, limited public information, significant transaction value, or moderate concerns.
HIGH	Sanctions exposure, unexplained ownership, questionable documentation, or serious adverse information — subject to Enhanced Due Diligence.

18. Red Flags requiring additional scrutiny

- Refusal to provide company documents or identify the beneficial owner
- Inconsistent, fake or unverifiable company information
- Representative unable to prove authority
- Unusual payment instructions or requests to pay unrelated third parties
- Unrealistic prices, unusual urgency, or unexplained intermediaries
- Sanctions concerns or significant adverse media

19 KYC APPROVAL STATUS

KYC Approved	Required checks satisfactorily completed
Approved with Conditions	May proceed subject to specified conditions
KYC Pending	Additional information or documentation required
Enhanced Due Diligence	Additional verification required
KYC Rejected	Buyer does not meet AGTL's acceptance criteria
KYC Suspended	Relationship temporarily suspended pending review

20–25 RECORDS, CONFIDENTIALITY & REVIEW

Buyer KYC File

AGTL maintains a KYC file per buyer: questionnaire, incorporation and licence documents, UBO and mandate records, screening results, risk assessment, and approval history.

KYC completion does not guarantee financial capacity, payment, delivery, or contract performance. Sellers must still conduct their own independent due diligence before signing an SPA, accepting an ICPO, or shipping goods. AGTL reserves the right to decline, suspend, or terminate any relationship where material compliance concerns arise.

Confidentiality & Review

Information is restricted to authorized personnel, stored securely, and used only for legitimate business and compliance purposes. Buyers are reviewed periodically and whenever a material change occurs; high-risk buyers more frequently.

26 BUYER DECLARATION

"We confirm that the information and documents provided to Africa Global Trade Link Ltd are true, accurate, complete and current to the best of our knowledge. We confirm that the person providing this information is authorized to represent the company. We agree to notify Africa Global Trade Link Ltd of any material change affecting the information supplied."

27 FINAL KYC PRINCIPLE

Verify the company. Verify the people. Verify the mandate. Understand the transaction. Screen the risks. Document the decision.

The objective is not to make legitimate trade unnecessarily difficult — it is to create a professional framework through which AGTL can identify credible commercial counterparties and reduce avoidable risks while facilitating international business relationships.

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Implementation note: This is a corporate policy template, not a substitute for Rwanda-specific legal advice. Before formal adoption, AGTL should have this policy reviewed against the laws and regulatory requirements applicable to its actual activities, jurisdictions, products and transaction structures.