

CLIENT ACCEPTANCE POLICY

OEXN LIMITED

Licensed and regulated by the Cyprus Securities
and Exchange Commission, Licence no. 423/22.
Business Address: 1 Kalimnou Street, Office 602,
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1. Introduction

OEXN Ltd (“OEXN”, the “Company”) is a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 423/22. The Company is located at 1 Kalymnou office 602, 6037, Larnaca. The registered address of the company is 106 Gladstonos, 3031, Limassol, Cyprus.

2. Scope

The Company has developed a Clients’ Acceptance Policy in order to understand the clients’ profile and their purpose of investment activity which may lead to Company’s number of risks and mitigate those risks accordingly.

The Clients’ Acceptance Policy incorporates the following:

- Client’s categories who are not allowable for establishing a business relationship with the Company;
- New clients accepting criteria;
- Client’s categorisation criteria on risk-based approach that includes three categories (i.e. low risk, medium risk or high risk).

3. Clients’ Risk Categorisation

The clients’ risk categorisation takes into consideration the following 4 (four) factors:

- Background of the client – The client’s background includes the client’s profession, his/her knowledge of and experience in financial instruments and/or type of investment services, academic or professional qualifications, etc.
- Client’s type, nature of business transactions, source of origin of funds and anticipated level – clarification and description of the client’s business activities, area of expertise and work experience.

- Country of origin – This parameter will allow the Company to identify whether the client is located in a country which does not apply or apply inadequate measures and policies for combating money laundering and terrorist financing. In such cases the Company will be asking for additional information regarding the client to ensure that the risk of accepting a client involved in money laundering or terrorist activities is eliminated.
- The services and financial instruments applied for by the client and the anticipated level and nature of business transactions – This information is collected in order to ensure that they correspond to the client’s profile and level of knowledge.
- Expected source and origin of funds – This is considered an important parameter as it allows the Company to assess whether the funds used by the client may be the result of money laundering or other criminal activities and thus take evasive actions.

4. Process for Accepting Clients

The process for accepting a client is the following:

- Certified true copies of all appropriate documentation necessary for the Company in order to establish the true identity of all the prospective clients.
- A questionnaire will be filled by all prospective clients where they will provide to the Company all required information such as client’s experience and financial background, risk objectives and investment, etc. The purpose of the questionnaire is to allow the Company to evaluate the information received in order to identify client’s attitude to risk so as to perform the Suitability Test in accordance with Article 26(2) of the Law regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets, taking out necessary test in accordance with article 26(3) of

L.87(l)/2017 and assign the necessary risk categorisation and investment strategy.

- The prospective client's documentation will be collected by the Compliance/AML officer that carries out an introductory examination of the submitted documentation conducive to determine whether the information provided is, sufficient, comprehensive, complete and valid and does not counter with any other information in the knowledge of the Company from any other sources. In addition, various checks will be performed by the Compliance/AML officer at the same time at different relevant sites, in order to ensure that any prospective client is not involved with illegal activities in any way.
- Following the confirmation by the Compliance/AML officer all the prospective clients are provided with the appropriate MiFID information such as, Letter of Categorisation, Conflicts of Interest Policy, Term of Business, and the duly signed services agreement etc.
- A new account is opened in the Company's system as soon as the services agreement has been signed and the list of clients is updated so as to include the relevant information regarding the new client.

The Company will not accept clients for opening an account if:

- They refuse to provide the information required according to the Company's KYC procedures.
- They refuse to submit sufficient information for the performance of the Suitability Test.
- The documents submitted appear to be falsified at the examination stage.
- The client has a bad credit history, and this fact is confirmed by a third party (e.g. bank).
- The client was refused at any point the granting of a license or had a license suspended or withdrawn.

- The origin of wealth and/or source of funds of the prospective client cannot be verified with reasonable accuracy and certainty.
- The beneficial owners or any of the directors of a prospective client are found to be people involved in terrorist financing or known to be involved in activity connected to money laundering.
- The Company or any of its related companies had a business relationship with the prospective client in the past which was terminated due to the client's failure to meet its obligations.
- The client is under investigation by the supervisory authorities.
- The profile of the client does not fit the client profile with which the Company wishes to be associated with.