

#### TMW CLIENT ONBOARDING POLICY

**At TMW Advisory LLC**, we are committed to ensuring a seamless, compliant, and client-centric onboarding experience. Our onboarding process adheres to the highest legal and regulatory standards, including U.S. federal laws and international compliance requirements, while fostering personalized relationships with each client.

## Scope

This policy applies to all prospective clients, both U.S.-based and international, engaging with TMW Advisory LLC for wealth management, business strategy, and other family office services.

### **Know Your Client (KYC) Process**

To comply with U.S. Anti-Money Laundering (AML) regulations, Patriot Act requirements, and international KYC standards, the following steps are implemented during onboarding:

## (1) Identity Verification

**U.S.** Clients: Provide a government-issued photo ID (e.g., passport, driver's license) and proof of address (e.g., utility bill).

**International Clients**: Submit a certified copy of a government-issued ID, proof of residence, and, where applicable, a tax identification number (TIN).

**Corporate Entities**: Submit incorporation documents, ownership structure, and the identity of beneficial owners.

## (2) Source of Funds and Wealth

Clients must disclose the origin of funds and assets intended for management, supported by documentation (e.g., bank statements, financial records, or trust instruments).

### (3) Risk Assessment

Each client will be subject to a risk profile assessment to identify and mitigate risks related to compliance, reputational concerns, or legal exposure.

#### (4) Sanctions and PEP Screening



International clients will be screened against global sanctions lists and politically exposed persons (PEP) databases.

## **Timeline for Onboarding**

## (1) **Initial Consultation** (Day 1–3):

- o Prospective clients complete a detailed questionnaire providing information on their financial goals, assets, and legal requirements.
- Clients are then scheduled for a one-on-one consultation with an assigned advisor.

## (2) **Document Collection and Verification** (Day 3–10):

Clients submit all required documentation for identity verification, source of funds review, and compliance checks.

## (3) **Approval and Finalization** (Day 10–14):

Upon satisfactory completion of due diligence, a formal agreement is executed, and client accounts are activated.

## **Compliance with U.S. and International Laws**

- (1) **Data Security**: All client data is handled in compliance with U.S. data protection laws and international frameworks, including GDPR where applicable.
- (2) **Reporting Obligations**: The Firm complies with mandatory reporting requirements under U.S. laws (e.g., FATCA) and international treaties.
- (3) **Jurisdictional Compliance**: For international clients, local regulations will be considered to ensure compliance with their country of residence.

## **Client Responsibilities**

To facilitate onboarding, clients are required to:

- (a) Provide complete and accurate information.
- (b) Submit requested documentation promptly.
- (c) Disclose material changes to their financial or legal circumstances during the onboarding process.



# **Disclaimer**

TMW Advisory LLC reserves the right to decline onboarding any client that fails to meet its legal, regulatory, or internal compliance standards.

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For further inquiries about our onboarding process, please contact us directly.

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