



ONBOARDING AND MONITORING

KYC and AML Procedures Manual

Investor Onboarding Controls, Sanctions Screening, and SAR Obligations

UnyKorn Capital Markets

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Classification:

Restricted — BD Only

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OVERVIEW

UnyKorn's investor onboarding module enforces a multi-step KYC/AML process for every investor prior to subscription processing: identity document collection and verification, sanctions screening against OFAC SDN, EU Consolidated, UN Security Council, and FinCEN watchlists, beneficial ownership documentation for entity investors, and source of funds documentation above defined thresholds.

Screening is performed in real time at onboarding initiation and again at subscription. Adverse media monitoring is available as an enhanced due diligence add-on for institutional investors. All screening results, pass/fail determinations, and override authorizations are logged in the compliance vault with identification of the authorizing party and decision timestamp.

Suspicious activity reporting obligations remain with the sponsoring broker-dealer as the registered FinCEN-obligated institution. The platform delivers a formatted SAR preparation package to the compliance team when behavioral flags exceed defined thresholds. Threshold configuration is set by the sponsoring BD's AML officer during onboarding. Alerts are available for real-time compliance officer notification on flagged events.



PARTNER IMPLEMENTATION CHECKLIST

- 1 Define investor KYC tier thresholds with AML officer
- 2 Configure sanctions screening list subscriptions
- 3 Establish beneficial ownership collection for entity accounts
- 4 Set source of funds threshold for enhanced documentation
- 5 Enable SAR preparation package and alert routing
- 6 Set up adverse media monitoring for institutional investors
- 7 Test full KYC workflow in sandbox with a sample investor set

NEXT STEPS — Unykorn Capital Markets Partnership Desk

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