

New Account Opening Procedure

Introduction

- The purpose of this procedure is to ensure that the proper documentation is obtained from all new clients prior to opening one or more accounts with Anonymous Co. for compliance.
- The firm's form #94 will have already been provided to the new client during the new business process as written in the Anonymous Co. Compliance Manual.

Prior to a New Account Opening

1. Client must receive from Anonymous Co. a copy of the following:

- Executed contract
- Anonymous Co.'s current form #94
- Client privacy notice
- Voting policy
- Company guidelines

2. Anonymous Co. must receive from the client

- Completed contract
- Completed account application(s)
- A photographic copy of approved government-issued identification
- If appropriate, Trust documents

3. Filing

- File all electronic copies of contracts and opening documents on the company server as well as the Customer Relationship Management (CRM) system.

4. Forms

- The firm must execute all the appropriate application forms required by the custodian.

First Month After the New Account Opening Protocol

Operations staff

The first month after the new account opening has been completed, the following must be done by Operations staff and reported as complete to the CCO:

1. Client's month-end statement.
2. Advent month-end appraisal.