# Proba Know Your Customer (KYC) policy

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# Introduction

This Know Your Customer (KYC) policy is designed to ensure compliance with regulatory requirements and to mitigate risks associated with onboarding customers, buyers and Validation and Verification Bodies (VVBs) in the context of Proba certified GHG projects. Our aim is to establish and verify the identities of all participants, assess their background and risk levels, and maintain transparent and undisputable operations in the pursuit of climate impact.

# Scope

This policy applies to all users, organizations or entities participating in a Proba GHG project, and therefore are creating an account on the Proba platform. We distinguish three different types of stakeholders:

- Customers (GHG project developers)
- VVBs (Validation and Verification Bodies)
- Buyers (of Carbon Credits and/or Impact Units)

Note that VVBs (Validation and Verification Bodies) are subject to a separate onboarding process that includes the requirements of this KYC policy.

# KYC process

The main objectives for Proba to define a KYC policy are as follows:

- Verify the identity of all users of the Proba platform
- Prevent fraud, money laundering and other illegal activities related to the issuing or use of Carbon Credits and/or Impact Units
- Assess the risk levels associated with doing business with customers, buyers and VVBs
- Maintain compliance with relevant legal and regulatory requirements
- Promote trust and transparency in Proba and the Proba Standard

The Proba KYC process consists of the following steps:

- Registration and identification of organizations and users
- Verification of identity
- Performing a background check

- Approval of organizations and users
- Review of organizations and users

## Registration and identification

Proba asks organizations and stakeholders to register on the Proba platform: https://app.proba.earth/register.

Additionally, organizations are required to submit a completed and signed onboarding form, including:

- Company name
- Registered address
- Company identification number and details of the relevant Chamber of Commerce where the organization is registered
- Contact details and website of the company
- Name and email of primary contact
- Expected Carbon Credit volumes

The onboarding form[1] can be found in the document library[2] on the Proba website.

Individual users must register with:

- First name
- Last name
- (Company) email address
- Organization

Any organization completing the onboarding form is required to declare adherence to our Code of conduct[3]. The main purpose of adhering to the Code of conduct is to mitigate the risk of conflicts of interest between project developers, VVBs, buyers and/or Proba.

## Verification of identity

Once organizations and primary contacts are created, Proba verifies identity, legal status of the business and other relevant documents. Based on organization

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[1] https://proba.earth/hubfs/Downloads/Proba_Onboarding_Form.docx
[2] https://proba.earth/document-library
[3] https://proba.earth/hubfs/Downloads/COC_Project_Stakeholders.pdf

characteristics, (expected) Credit volumes and risk profile, Proba may request additional proof or documentation, such as: bank account statement, annual report, ownership structure, chamber of commerce extract, offtake agreements, etc.

The primary contact of the organization will be asked to verify newly registered users (after the primary contact and organization are verified and approved by Proba, see next steps).

## Background check

Proba may use several sources to perform a background check on the organization and primary contact person. This may include, but is not limited to:

- Publicly available news (reputation / bad news check / Politically Exposed Person (PEP))
- Sanction lists
- Financial checks or financial statements
- Chamber of commerce

## Approval

After assessment of the risk associated with doing business, Proba may approve the organization or entity. Individual users are approved by the primary contact(s) of an organization.

## Review

Proba continuously monitors registered users and organizations on the Proba platform.

Proba may block or close the account of any individual that fails to comply with the KYC policy and procedures, or that provides false, misleading, or fraudulent information or documents.

# Review of the KYC policy

Proba monitors and reviews its KYC policy and procedures yearly to ensure that they are effective, efficient, and compliant with the applicable laws and regulations. Proba may update its KYC policy and its procedures at any time, and will notify all organizations and users in case new requirements apply.