



PROTOCOL 01: INSTITUTIONAL AML/KYC FRAMEWORK & COMPLIANCE STACK

Internal Operational Standard: PC-GOV-01 Classification: Public
Summary for Strategic Partners

Executive Overview

At ProxyCore, we treat regulatory compliance not as a reactive burden, but as a strategic asset. **Protocol 01** defines our internal architecture for identifying, verifying, and monitoring the entities we manage. This framework ensures that every ProxyCore-managed business operates within the highest standards of the **Wolfsberg Group**, **FATF**, and the latest **EU AML Directives (5AMLD/6AMLD)**.

1. The Gateway: Multi-Tiered Onboarding

We do not accept "instant" clients. Every partnership begins with a rigorous vetting process designed to protect the integrity of our ecosystem.

- **Identity Verification (KYC):** Biometric and documentary verification of all Ultimate Beneficial Owners (UBOs) and legal representatives.
- **Sanctions & PEP Screening:** Real-time screening against global watchlists (OFAC, EU, UN, HM Treasury) and Politically Exposed Person (PEP) databases.
- **Adverse Media Forensic:** Deep-web and OSINT analysis to identify reputational risks before they reach the banking system.

2. The Forensic Layer: Source of Wealth (SoW) & Funds (SoF)

We understand that for high-net-worth individuals, wealth is often multi-generational or built across complex jurisdictions. We specialise in "translating" this complexity into a format that Tier-1 banks trust.

- **Capital Mapping:** We build a comprehensive "Wealth Narrative" that documents the origin of capital through tax returns, sale of business records, inheritance documents, or investment dividends.

- **Source of Funds Verification:** For every major capital injection, we require and verify the specific transactional trail.
- **No-Gap Policy:** We ensure there are no chronological gaps in the history of wealth, making the dossier "bulletproof" for institutional audits.

3. Operational Monitoring: The Transaction Stack

Compliance is a live process, not a static file. We monitor the "heartbeat" of your business.

- **Pre-Vetting of Transactions:** Major outflows are cross-referenced against the company's business profile and declared counterparties *before* execution.
- **Activity Consistency:** We compare current transactional behaviour against established historical patterns. Sudden spikes or unusual geographic flows trigger an immediate internal review.
- **Counterparty Due Diligence (KYB):** We don't just know you; we know who you do business with. We perform baseline checks on your primary suppliers and clients to prevent "guilt by association" risks.

4. The Archive of Proof: Audit Readiness

Our goal is to resolve any regulatory inquiry in the first 24 hours.

- **Zero-Hour Retrieval:** All compliance documentation is digitised, indexed, and mirrored in our physical **Iron Archive**.
- **Dynamic Updating:** KYC/KYB records are refreshed on a rolling basis (annually for high-risk profiles, triennially for standard profiles) to ensure they are never "stale" when a bank requests an update.
- **Professional Representation:** In the event of an inquiry, ProxyCore fiduciaries act as the primary interface, presenting the compliance stack with the authority of an established European institution.

5. The Ethical Mandate

ProxyCore operates on a foundation of absolute transparency with its partners and absolute rigidity with the law.



- **Zero Tolerance:** We do not provide services for activities related to fraud, money laundering, or any form of illicit trade.
- **Exit Protocol:** We reserve the right to unilaterally terminate management should a client fail to maintain the standards set forth in **Protocol 01**.

"Our defence is impenetrable precisely because our clients are legitimate. We use the law as a shield for the efficient, not a cloak for the dishonest."