



Know Your Customer (KYC) and Due Diligence Policy

(Applicable to Immigration & Education Services)

Executive Summary

AS Foreign Education Consultants (hereafter named as ASFE) is committed to maintaining the highest standards of compliance with international Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), and sanctions regulations. This policy outlines the robust processes that ASFE uses to ensure thorough and efficient client due diligence, screening, and ongoing monitoring. By utilizing the LSEG World-Check One platform, ASFE effectively screens clients for political exposure, sanctions compliance, and adverse media, following global FATF (Financial Action Task Force) recommendations.

This policy applies to all ASFE operations globally, including the UK and Pakistan, covering both individual and corporate clients. By implementing a Risk-Based Approach (RBA), ASFE tailors its due diligence process to the specific risk level associated with each client. Enhanced Due Diligence (EDD) is required for higher-risk clients, ensuring compliance with all applicable laws and safeguarding ASFE from potential regulatory and reputational risks.

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1. Introduction

ASFE is committed to maintaining compliance with global Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), and sanctions regulations. Our Know Your Customer (KYC) and Due Diligence process ensures that we meet the highest standards for vetting clients, screening for political exposure, sanctions lists, and adverse media risks. By using LSEG World-Check One, we comply with international FATF recommendations and conduct ongoing monitoring throughout the client relationship.

2. Scope

This policy applies to:

- All ASFE citizenship and investment migration services
- All global client operations, including offices in the UK and Pakistan
- Both individual and corporate applicants
- Third-party intermediaries and partners

This policy covers client onboarding, risk assessment, enhanced due diligence (EDD), and ongoing monitoring to ensure compliance with all relevant laws and regulations.

3. Governance and Responsibility

ASFE's Compliance Team is responsible for the design, execution, and monitoring of our due diligence processes. The team ensures that all KYC and AML protocols are followed and provides oversight on the use of screening tools such as LSEG World-Check One. Key responsibilities include:

- Integration and use of LSEG screening tools
- Review and approval of KYC documentation
- Escalation of high-risk cases
- Compliance training and awareness programs
- Ensuring timely regulatory reporting and audits

The Compliance Officer has the final decision-making authority on high-risk cases, including approvals for enhanced due diligence.

4. Customer Onboarding Process

The client onboarding process is designed to ensure all clients undergo thorough due diligence checks:

1. Document Collection: Collect KYC documents (Passport, Proof of Address, Source of Funds).
2. Document Verification: Verify the authenticity of all documents.
3. Screening: Use LSEG World-Check One to screen clients for PEP status, sanctions, and adverse media.
4. Risk Categorization: Classify clients as Low, Medium, or High-Risk based on the initial screening results.
5. Compliance Review: The Compliance Officer reviews the screening results and documents before granting onboarding approval or rejection.

Client Communication: Clients are informed of their responsibilities throughout the onboarding process. They are notified of any delays or additional document requests if they are categorized as high-risk.

5. Risk-Based Approach (RBA)

ASFE implements a Risk-Based Approach (RBA) to determine the level of due diligence required for each client. The approach focuses on identifying and mitigating risks based on a client's profile:

- Low-Risk: Clients from jurisdictions with strong AML frameworks, low exposure to financial crimes.
- Medium-Risk: Clients from transitional or emerging jurisdictions, or those with moderate exposure.
- High-Risk: Includes clients with potential PEP status, clients from high-risk jurisdictions, or cash-intensive businesses.

Enhanced Due Diligence (EDD) is applied to high-risk clients, which may include:

- Additional requests for documentation (e.g., source of wealth)
- In-depth background checks
- Senior management approval prior to onboarding
- Enhanced monitoring throughout the client relationship

EDD Investment Migration Levels:

- EDD Investment Migration L3: Applied to clients with moderate-to-high-risk profiles. Includes additional checks such as wealth verification and source tracing.

- EDD Investment Migration L4: For the highest-risk clients, involving comprehensive investigations, including asset tracing, consultations with external experts, and approval from the Risk Committee before proceeding with onboarding.

6. Politically Exposed Persons (PEPs)

PEPs are individuals who hold or have held prominent public positions. All clients are screened for PEP status using LSEG World-Check One. If a client is flagged as a PEP, the following steps are taken:

- Enhanced Due Diligence (EDD) is mandatory.
- Onboarding requires approval from the Compliance Officer.
- Ongoing monitoring continues for any changes in PEP status during the client's relationship with ASFE.

Client Communication: Clients flagged as PEPs are notified about the enhanced due diligence process and any additional requirements.

7. Sanctions Screening and Watchlists

ASFE screens all individuals and entities against major international sanctions and watchlists, including:

- United Nations (UN)
- Office of Foreign Assets Control (OFAC) – USA
- European Union (EU)
- United Kingdom (UK HMT)

If a client matches any sanctions or watchlist criteria, the onboarding process is suspended, and a regulatory escalation is initiated. Clients are notified of such suspensions in line with compliance procedures.

8. Ongoing Monitoring

ASFE uses LSEG World-Check One for real-time monitoring of client activities.

Monitoring includes:

- Updates on sanctions lists and PEP status changes.
- Detection of any adverse media or regulatory actions.
- Real-time alerts when any of the above criteria change.

Annual KYC Refresh: For medium and high-risk clients, an annual KYC review is conducted to ensure that all client information remains accurate and up to date.

9. Record Keeping

ASFE maintains detailed, secure, and encrypted records of all client information and due diligence activities.

- Retention Period: At least 7 years after the termination of the client relationship, in line with regulatory requirements.
- Access: Records are only accessible to authorized personnel.
- Logs: All KYC documentation, screening history, and compliance actions are retained and logged.

10. Training and Auditing

ASFE ensures that all staff undergoes mandatory training in AML, KYC, and LSEG World-Check One usage:

- Induction: All new employees are trained on compliance policies and procedures.
- Refresher Training: Annual training sessions for all employees, with specialized training for compliance staff.
- Internal Audits: Compliance conducts internal audits on a quarterly basis to ensure adherence to this policy and regulatory requirements.

11. Reporting Obligations

ASFE files Suspicious Activity Reports (SARs) with the appropriate authorities if suspicious activities are detected:

- UK: National Crime Agency (NCA)
- Pakistan: Financial Monitoring Unit (FMU)

SARs are logged and monitored internally, ensuring that follow-up actions are taken as required.

12. Data Protection

ASFE is committed to maintaining the privacy and security of all client data in compliance with the UK GDPR, Pakistan Data Protection Act, and any relevant jurisdictional laws.

- Client Data: All personal data is encrypted and stored securely.
- Access: Data access is restricted to authorized personnel only.
- Third-Party Transfers: Client data is not transferred to third parties without explicit consent.



Appendix A: Due Diligence Workflow

1. Initial Client Contact
2. Document Collection
3. Screening via LSEG World-Check One
4. Risk Categorization
5. Enhanced Due Diligence (if needed)
6. Internal Compliance Review
7. Onboarding Approval or Rejection
8. Ongoing Monitoring

Appendix B: Glossary of Terms

- AML – Anti-Money Laundering
- CTF – Counter-Terrorist Financing
- EDD – Enhanced Due Diligence
- KYC – Know Your Customer
- LSEG – London Stock Exchange Group
- PEP – Politically Exposed Person
- RBA – Risk-Based Approach
- SAR – Suspicious Activity Report

Appendix C: LSEG World-Check One – Full Reporting Protocol

LSEG World-Check One is ASFE's primary platform for client screening and monitoring. It offers comprehensive reports, including:

- Risk Categories: Sanctions, PEPs, adverse media, criminal networks, etc.
- Screening Types: Batch and single-name screenings.
- Report Components: Identity

Approved by: AS Foreign Education Consultants Limited Compliance Team

Effective Date: 01.01.2025

Next Review Date: 01.01.2026

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