



Know your counterparty (KYC) policy

Version sheet

Date	Version	Created by	Description of Change
16-04-2025	1.0	Bernice Bekkers	Document created
10-11-2025	1.1	Sicco Ouwersloot	Document modified
13-11-2025	1.2	Bernice Bekkers	Document reviewed

Know Your Counterparty (KYC) Policy

1. Purpose of this Policy

Reuzado is committed to responsible and transparent business practices. This policy describes how we ensure integrity in our business relationships.

The purpose of this policy is to ensure that Reuzado only engages with reliable, ethical, and legally compliant business partners. Through thorough Know Your Counterparty (KYC) policy, Reuzado seeks to prevent involvement in illegal, unethical, or high-risk practices such as fraud, money laundering, human rights violations, or environmental harm. KYC is an integral part of Reuzado's due diligence approach, promoting transparency and trust throughout the value chain.

2. Scope

This policy applies to all Reuzado employees and departments involved in supplier management, customer relations, contract management, and compliance. It covers all suppliers, customers, subcontractors, and business partners—both domestic and international—and applies to both new and existing relationships.

This policy should be read in conjunction with the Reuzado Code of Conduct, which outlines our broader ethical, social, and environmental standards

3. Policy Principles

Legal Compliance – Reuzado complies with all applicable laws and regulations, including the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft).

Transparency – All business partners are required to provide accurate and complete information regarding their identity, ownership structure, and operations.

Risk-Based Approach – The intensity of due diligence depends on the level of risk associated with the relationship (low, medium, or high).

Privacy and Proportionality – Personal data collected through KYC is processed in line with the GDPR and used solely for compliance purposes.

Continuous Monitoring – All business relationships are periodically reviewed to ensure ongoing compliance and to detect new risks.

4. Application of the Policy

4.1 Identification

Reuzado collects core information about each business partner, including company name, registration and tax numbers, official address, management names, and Ultimate Beneficial Owners (UBOs), as well as relevant licenses or certifications.

Reuzado screens suppliers and clients for legal compliance, ethical conduct, and certification status (e.g., WEEELABEX, R2, ISO 14001).

4.2 Verification

The collected information is verified through official records, documentation, and trusted third-party sources. Additional clarifications may be requested if information is incomplete or inconsistent.

4.3 Risk Assessment

Each business relationship is assigned a risk classification based on geography, sector, ownership, and compliance history. High-risk partners require management approval and enhanced due diligence measures.

4.4 Approval and Cooperation

A relationship can only be approved after a positive assessment. Business engagements with unresolved or severe red flags will not be initiated or continued until the risks are mitigated to Reuzado's satisfaction.

4.5 Monitoring and Review

Existing relationships are reviewed annually or whenever significant changes occur, such as ownership changes, legal risks, or reputational issues. Newly identified risks trigger re-evaluation or termination of the relationship.

5. Roles and Responsibilities

Role	Responsibilities
Procurement & Sales Teams	Conduct initial KYC checks, collect and store relevant documentation.
KAM manager	Review KYC results, perform risk assessments, and ensure compliance with laws and internal standards.

Management Team

Approve high-risk relationships and oversee adherence to this policy.

All Employees

Report any irregularities or suspected non-compliance with KYC standards.

6. Documentation and Record Keeping

All KYC records, including forms, verification evidence, and risk assessments, are securely stored for a minimum of five (5) years after the end of a business relationship. Access is restricted to authorized personnel only.

7. Non-Compliance

Failure to comply with this policy may result in disciplinary action or termination of the business relationship. Serious breaches will be reported to relevant authorities as required by law.

8. Policy Review

This policy will be reviewed annually and updated as necessary to reflect legal changes, business developments, or improvements in Reuzado's due diligence practices.

This Know Your Counterparty Policy has been reviewed and approved by the Management Team of Reuzado B.V.

It forms part of Reuzado's broader compliance and sustainability framework, alongside the Reuzado Code of Conduct.

Approved by: Reuzado Management Team

Date: July 2025

Next Review: July 2026