

# **Nexus Capital — KYC (Know Your Customer) Policy**

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This document is published for transparency. Internal operational procedures are confidential to preserve the effectiveness of controls.

## **1. Purpose and principles**

Nexus Capital adopts a Know Your Customer (KYC) Policy aligned with the best practices of the regulated market, under a risk-based approach. The identification and due diligence applied to each counterparty are proportional to its risk profile and to the nature of the transaction.

## **2. Scope**

This policy applies to every counterparty trading with Nexus Capital on any P2P platform used and to every staff member involved in onboarding, monitoring or customer support.

## **3. Legal basis**

- Law No. 9,613/1998 (Brazilian AML/CFT Act) and related regulations.
- Law No. 14,478/2022 — Brazilian Virtual Assets Legal Framework.
- Law No. 13,709/2018 — Brazilian General Data Protection Law (LGPD).
- COAF Resolution No. 36/2021 and rules applicable to virtual asset service providers.
- Rules and Terms of the P2P platforms used (including, without limitation, Binance P2P).

## **4. Risk-based approach**

Each counterparty is classified according to objective risk indicators. The higher the risk, the more robust the due diligence — potentially escalating to Enhanced Due Diligence (EDD) in cases such as Politically Exposed Persons (PEP), indicators of unusual source/destination of funds or alerts on restrictive lists.

The quantitative parameters of the risk matrix (tier-specific thresholds, granular alert indicators) are confidential to preserve the effectiveness of the controls.

## **5. Identification and data that may be requested**

- Government-issued photo ID (Brazilian RG, CNH or passport) and Tax ID (CPF).
- Selfie with liveness check, when applicable.

- Recent proof of address.
- Confirmation of bank/Pix account ownership.
- Statements about the purpose of the transaction and source of funds, when justified by the risk profile.
- For legal entities: corporate Tax ID (CNPJ), articles of association/bylaws, shareholding chart (QSA) and identification of the ultimate beneficial owner(s).

## **6. Verifications performed**

- Cross-checking of the information provided against public sources and official databases.
- Screening against restrictive lists (national and international sanctions — OFAC, UN, European Union, applicable national lists).
- Politically Exposed Person (PEP) check, including close relatives and associates.
- Consistency analysis between the declared identity and the data of the platform used.

## **7. Prohibitions and refusal criteria**

- Third-party payments: we do not accept transactions where the payer differs from the holder registered on the platform, unless there is documented justification compatible with the applicable rules.
- Invalid or tampered documents, or indicators of synthetic identity / money mule patterns.
- Refusal by the customer to provide information proportional to risk.
- Attempt to operate outside the platform, circumvent rules or pressure for speed incompatible with required due diligence.
- Positive match on restrictive lists without possibility of mitigation.

## **8. Recertification and customer data updates**

Customer data may be reviewed periodically or extraordinarily upon events such as a material change in the transactional profile, divergence in official sources or subsequent inclusion on restrictive lists. The specific cadence and automatic triggers are confidential.

## **9. Privacy and data subject rights (LGPD)**

Personal data is processed under the legal bases of compliance with a legal/regulatory obligation, regular exercise of rights and legitimate interest, as applicable.

The data subject has the right to: confirmation of processing, access, correction, portability within legal limits, anonymization/deletion when applicable and information about sharing — subject to regulatory retention obligations. See the Privacy Policy for details.

## **10. Records retention**

Identification records, transactional records and due diligence evidence are retained for the minimum period required by applicable law, observing the purpose of regulatory proof and legal defense.

### **11. Right of reply**

A customer whose transaction has been refused or whose relationship has been terminated may request review through the customer support channel, providing supporting documentation. The final decision shall observe the criteria of this policy and the applicable legal obligations.

### **12. Alignment with the AML/CFT Policy**

This KYC Policy is part of the AML/CFT program of Nexus Capital and must be read together with the AML / CFT Policy.

### **13. Effective date and final provisions**

This Policy is effective on its publication date. Questions and LGPD rights requests: meajuda@nexuscapitalp2p.com.br.

**Notice**

Detailed operational procedures, tier-specific quantitative thresholds, specific escalation triggers and technical tooling used are confidential information and are not disclosed.