



MEZZARION AGENT & INTRODUCER POLICY (PUBLIC) v1.2

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Change Log (Mandatory)

Date	Version	Summary of Changes	Reason
01 Dec 2025	v1.1	Prior public release	Baseline agent governance
24 Jan 2026	v1.2	Introduced lead-agent and team-participant controls, tiered KYC by access, anti-daisy-chain payment posture	Bank-grade scalability + dispute prevention

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1. Purpose

This policy defines how Mezzarion engages agents, brokers, and introducers (“Agents”) in all trading activities to:

- Prevent legal, reputational, fraud, and AML/sanctions risk from uncontrolled intermediaries.
- Ensure Agents are treated consistently and only rewarded for real, profitable business.
- Preserve senior time for deal-critical interactions.
- Maintain standards acceptable to banks, trade finance providers, and institutional partners.

2. Scope

This policy applies to:

- All individuals and entities who introduce potential buyers or suppliers to Mezzarion in exchange for commission.
- All products and corridors traded by Mezzarion.
- All Mezzarion legal entities and staff.

3. Definitions

- **Agent / Introducer:** Any person/entity that introduces Mezzarion to a potential buyer or supplier (“Principal”) in exchange for commission if business is concluded.
- **Principal:** The buyer or supplier with whom Mezzarion contracts directly.
- **Lead Agent:** The single recognised introducer for a specific introduced Principal/contact set and deal scope.

- Team Participant: A non-lead member of an introducer team who may be granted controlled access to observe or assist on a specific transaction. Team Participants are not fee claimants.

4. Core Principles (Bank-Grade Discipline)

1. Principals Only

Mezzarion contracts only with Principals. All SPAs/FCOs/ICPOs/LOIs and related contracts are between Mezzarion and the Principal.

2. Agents Are Sources, Not Counterparties

Agents originate introductions; they are not trading counterparties for product.

3. One Accountable Lead (Anti-Daisy-Chain)

Mezzarion recognises one Lead Agent per introduced Principal/contact set and deal scope.

4. No KYC, No Access

No calls, meetings, documents, introductions, or ongoing access without the required due diligence and screening.

5. Performance, Not Promises

No commission is payable for meetings, effort, or “access.” Commission is payable only when Mezzarion receives cleared funds from the Principal for a qualifying transaction.

6. Policy Over Panic

No deviation from KYC, credit, compliance, AML, or documentation standards due to agent pressure or “urgency.”

5. Agent Categories

1. Strategic Partner

Rare, high-value intermediaries with proven track record and/or formal mandate status.

2. Registered Lead Agent

Agents who have passed due diligence and signed Mezzarion's standard introducer/commission agreement.

3. Unscreened / Noise Broker

Unknown agents with no verified track record. Interaction is limited to initial filters; no ongoing access unless upgraded.

4. Team Participant

Non-lead participants granted limited, transaction-specific access subject to due diligence and a written undertaking.

6. Due Diligence & KYC Requirements (Tiered by Access)

6.1 Minimum Information (Pre-Screen)

Before any substantive engagement, the Agent must provide:

- Principal legal name and country
- Product and specification
- Approximate monthly volume
- Preferred incoterm
- Preferred payment method structure



If the Agent cannot provide this, engagement stops.

6.2 Lead Agent Due Diligence (Global Minimum Standard)

To become a Registered Lead Agent, Mezzarion requires:

Individuals:

- Government-issued photo ID (passport/national ID)
- Proof of address (\leq 3 months)
- Professional profile (CV/LinkedIn acceptable)
- Bank account in the Agent's own name (no third-party accounts)

Companies/Firms:

- Incorporation/registration documents
- Constitutional document (where applicable)
- Shareholder/beneficial owner disclosure (natural persons controlling $\geq 25\%$)
- IDs for beneficial owners and controlling directors
- Proof of registered address
- Bank account in the company's name

6.3 Team Participant Due Diligence (Transaction-Specific)

Team Participants may be granted limited access only if they provide:

- Government ID

- Basic verification (contact details)
- Sanctions/PEP screening clearance
- A signed participation undertaking covering confidentiality, conduct, and non-misrepresentation

7. AML / Sanctions / Anti-Bribery Requirements

1. Agents must comply with applicable AML/CTF, sanctions, and anti-bribery laws.
2. Prohibited conduct includes bribery, kickbacks, facilitation payments, fraud, misrepresentation, sanctions evasion, and hidden beneficial ownership.
3. Commission payments:
 - are made only to the bank account of the Registered Lead Agent that passed due diligence,
 - are not made in cash or crypto,
 - are not made to third-party accounts, except in rare cases with explicit written approval.

8. Onboarding Agents (Process Summary)

1. Initial filter: Agent provides minimum Principal details (6.1).
2. Due diligence: Mezzarion collects documents and conducts screening (Section 6).
3. Registration: approved Lead Agents sign Mezzarion's standard introducer/commission agreement.
4. Transaction participation: team participants may be granted limited, transaction-specific access after completing Section 6.3.

9. NCNDA / Non-Circumvention Rules

1. Mezzarion does not sign external NCNDA templates or blind NCNDAs.
2. Mezzarion uses its own standard NCNDA / introducer agreement.
3. Non-circumvention applies only to:
 - named Principals/contacts,
 - specified products/territories,
 - a defined period (typically 12–24 months).
4. Team Participants are not independent fee claimants and do not create additional commission liability for Mezzarion.

10. Commission Rules & Caps

10.1 Structure

Commission must be agreed in writing and defined as a clear rate and/or percentage.

10.2 Hard Cap (Bank-Grade Discipline)

Mezzarion maintains a hard cap on aggregate commission payable on any shipment/transaction to avoid broker-chain inflation. How intermediaries split internally is not managed by Mezzarion. Mezzarion normally pays one Lead Agent only.

10.3 Trigger

Commission is payable only when:

- Mezzarion receives cleared funds from the Principal for a qualifying shipment/transaction, and
- the Principal is listed under an active schedule/annex for that Lead Agent, and
- a valid invoice is submitted in accordance with the agreed structure and cap.

11. Meeting & Access Rules

- CEO time is reserved for deal-critical conversations.
- For substantive deal calls, the Principal decision-maker should be present.
- Meetings require a clear agenda; standard cap is 30 minutes.
- Access can be limited or withdrawn at Mezzarion's discretion.

12. System Logging & Transparency (High Level)

Mezzarion maintains internal records to ensure clear attribution of introductions, transaction participation, and compliance status, and retains relevant documentation for an appropriate period.

13. Misconduct, Monitoring & Termination

Grounds include false information, misrepresentation, policy pressure, bribery/sanctions/AML concerns, repeated disputes, abusive behaviour, or document leakage. Mezzarion may suspend or terminate immediately.

14. Exceptions

Any deviation from this policy must be justified in writing and approved by Mezzarion's authorised leadership.