

Mezzarion Customer Engagement Procedure (CEP) — v1.2

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WHY THIS EXISTS	3
WHO IT'S FOR	3
CUSTOMER BILL OF RIGHTS	3
SERVICE LEVELS (SLAs)	3
ROLES & DECISION RIGHTS (RACI – simplified)	3
GATE OWNERS & ESCALATIONS	4
THE 12-STEP JOURNEY (WITH STAGE-GATES)	4
Stage 0 — Entry	4
Stage 1 — Welcome & Triage	4
Gate A — Basic Fit Check	4
Stage 2 — Light KYC & Sanctions Pre-Screen	4
Stage 3 — Discovery Call	4
Stage 4 — Evidence Pack (Proof-First)	5
Gate B — Authenticity & Capacity	5
Stage 5 — Full KYC / Onboarding (Risk-Based)	5
Gate C — Onboarding Decision	5
Stage 6 — Solution Shaping & Terming	5
Stage 7 — Payment Instrument Validation	5
Stage 8 — FCO / Indicative Offer (Trade/Mining)	6
Stage 9 — Contracting (SPA/Agreement/Subscription)	6
Gate D — Execution Readiness	6
Stage 10 — Execution & Handover	6
Stage 11 — Post-Deal Care & Reconciliation	6
Stage 12 — Relationship Development	6
RISK-BASED ONBOARDING MATRIX (SUMMARY)	6
ACCEPTED PAYMENT METHODS & INSTRUMENT STANDARD	7
EVIDENCE ACCEPTANCE STANDARDS (RECAP)	7
QUALITY & ASSAY DISPUTE PROTOCOL (TRADE/MINING)	7
INTERMEDIARIES & FEES	8
RESPONSIBLE SOURCING (ESG)	8
ANTI-FRAUD & COMMUNICATIONS SECURITY	8
DATA PRIVACY, SECURITY & RETENTION	8
EXCEPTION GOVERNANCE	8
COMMUNICATION CADENCE & KPIs	9
CONTACT & NEXT STEPS	9
LEGAL NOTICE	9

WHY THIS EXISTS

Mezzarion's CEP gives every client—buyers, sellers, investors, and intermediaries—a clear, compliant, and fast route from first contact to signed deal. It is product- and business-agnostic and aligned to global practice in mining, trade, and investment.

WHO IT'S FOR

- Buyers (commodities, equipment, services)
- Sellers / Producers / Suppliers
- Investors / Capital Partners
- Intermediaries / Mandate holders

CUSTOMER BILL OF RIGHTS

- A named single point of contact (SPOC) and clear timelines
- Minimum-necessary documentation requests
- Transparent fees and commission waterfalls (no side payments)
- Globally recognised trade & banking rules (Incoterms® 2020; UCP 600; URDG 758; ISBP 745)
- Bank-grade privacy and security
- A fair, documented quality/assay and instrument dispute process

SERVICE LEVELS (SLAs)

- Acknowledge enquiry: < 24 hours
- Discovery call: ≤ 2 business days
- Pre-screen decision: ≤ 3 business days
- Term sheet / LOI: 5–10 business days post-evidence
- FCO (trade): 5–10 business days after onboarding approval
- Contract pack: 5 business days after commercial agreement

ROLES & DECISION RIGHTS (RACI – simplified)

- BD/Sales (SPOC): R — customer comms & orchestration
- Compliance (KYC/AML/Sanctions/Privacy): A/R — onboarding decision
- Legal: A — templates & variances (NDA/LOI/FCO/SPA)
- Risk / Treasury / Trade Finance: R — instrument validation & payment flows
- Ops & QA (incl. HSE/ESG & Labs): R — product/asset validation & chain-of-custody
- Exec Sponsor (if flagged): A — escalations/exceptions

GATE OWNERS & ESCALATIONS

- Gate A (Fit): BD/SPOC
- Gate B (Authenticity/Capacity): Ops + Compliance
- Gate C (Onboarding): Compliance
- Gate D (Execution readiness): Ops + Risk/Treasury

Auto-escalate if a stage exceeds its SLA by +2 business days (to Exec Sponsor); +5 business days (Exception Committee).

THE 12-STEP JOURNEY (WITH STAGE-GATES)

Stage 0 — Entry

Channels: website form, referral, outbound, events, email, hotline. Auto-acknowledge < 24h. Assign SPOC. Create CRM ID.

Stage 1 — Welcome & Triage

Send Welcome Pack (intro, process map, privacy notice, what's next).

Triage role (Buyer / Seller / Investor / Intermediary) and product family (Mining | Trade | Investment).

Open engagement record (unique ID).

Gate A — Basic Fit Check

Proceed only if the ask aligns with policy, geography, capacity.

Stage 2 — Light KYC & Sanctions Pre-Screen

Minimum set: legal name, registration country/number, UBO % bands, contact, website/LinkedIn.

Run RBA screening: UN/EU/OFAC/UK HMT; PEPs; adverse media; export-control red flags.

If hit/high-risk → full KYC or decline (with reasons).

Stage 3 — Discovery Call

Clarify objectives, volumes/values, timelines, logistics, payment preferences, ESG expectations.

Competition-law hygiene: no sharing of competitor prices, future pricing, market allocation.

Stage 4 — Evidence Pack (Proof-First)

Acceptance standards:

- Proof of funds or RWA/BCL on bank letterhead or authenticated SWIFT; include bank officer name + switchboard number for call-back. No screenshots/“tear sheets”.
- Stock/production proof via third-party inspection or warehouse receipt; photos with timestamp + geotag; avoid editable PDFs without source files.
- Mandate/authority: verifiable chain (corporate resolutions/owner attestations).

Gate B — Authenticity & Capacity

Compliance + Ops validate. Fail → pause/decline.

Stage 5 — Full KYC / Onboarding (Risk-Based)

Collect corporate docs, UBOs (≥10–25% as required), IDs, tax/address proofs, AML questionnaire, ESG declaration.

Apply jurisdictional overlays (GDPR/UK DPA/POPIA/CCPA/PIPEDA; sectoral HSE).

Issue risk rating: Green / Amber / Red.

Gate C — Onboarding Decision

- **Green:** proceed
- **Amber:** proceed with conditions (e.g., escrow only; capped exposure; independent inspection)
- **Red:** decline

Stage 6 — Solution Shaping & Terming

Trade/Mining: Incoterms, shipment/delivery windows, quality specs & testing protocol, inspection point(s), payment method (escrow/LC/SBLC/BG/OA+insurance).

Investment: ticket size, instrument, security, covenants, ESG undertakings, reporting.

Pricing integrity (if index-linked): publication, fix window (e.g., M-3 → M-1 at 16:00 London), rounding (4dp), fallback index hierarchy, and FX source (e.g., WM/Refinitiv 4pm).

Issue Term Sheet / LOI (plain English + glossary).

Stage 7 — Payment Instrument Validation

Validate LC/SBLC/BG vs UCP 600 / URDG 758 / ISBP 745; confirm bank tier; SWIFT authenticity; transferability/assignment; confirmation options.

Map escrow mechanics (licensed attorneys/regulated trustees; transparent fee waterfall).

Insurance & credit cover (as applicable): marine cargo, trade credit, political risk; evidence may be a condition precedent (CP).

Stage 8 — FCO / Indicative Offer (Trade/Mining)

Include price basis, quantity bands, performance tolerances, logistics plan, documentary set, CPs.

(Investment track moves to binding Term Sheet.)

Stage 9 — Contracting (SPA/Agreement/Subscription)

Use approved templates with riders: ABC, sanctions, export-controls, modern slavery, data privacy, ESG, audit rights, dispute forum, governing law.

Finalize fee letters & commission schedules in separate annex (all payees KYC'd).

Default dispute forum: English law; LCIA (London) or ICC (Paris) arbitration (seat & language stated); emergency arbitrator available.

Gate D — Execution Readiness

CPs met: instruments confirmed/escrow funded; inspections scheduled; insurance active; permits OK; HSE plan signed.

Stage 10 — Execution & Handover

Operational kickoff; run-book; contacts; escalation tree.

Status updates weekly (daily during instrument/shipment windows).

Stage 11 — Post-Deal Care & Reconciliation

Closeout documents (B/L, assays/CoA, inspection, payment advices, fee disbursements, tax/VAT docs).

Customer satisfaction pulse; lessons learned; next-cycle optimisation.

Stage 12 — Relationship Development

Quarterly value reviews; pre-clear upcoming instruments; event-driven & annual KYC refresh.

RISK-BASED ONBOARDING MATRIX (SUMMARY)

- **Green (Low):** proceed on standard terms. KYC refresh annually.
 - **Amber (Medium):** proceed with conditions (e.g., escrow only; capped exposure; independent inspection). KYC refresh at 6 months; event-driven re-screen.
 - **Red (High/Prohibited):** decline or pause pending remediation.
- Event-driven re-screen triggers: UBO/director/banking changes; adverse media; sanctions updates; PEP elevation; material contract/geography change; unusual instrument behaviour.

ACCEPTED PAYMENT METHODS & INSTRUMENT STANDARD

Accepted (case-by-case):

- Confirmed irrevocable documentary L/C (UCP 600)
- Standby L/C or demand guarantee (URDG 758)
- Regulated escrow (licensed attorneys/regulated trustees)
- Open account only with credit insurance or strongly rated counterparties

Mandatory criteria (all instruments):

- Rules named (UCP 600 / URDG 758; ISBP 745 where applicable)
- Issuance via authenticated SWIFT (e.g., MT700/701; MT760). No screenshots or “tear sheets”.
- Issuing/confirming bank on acceptable list; independent call-back via published switchboard (high-value).
- No “soft” or non-documentary conditions; reasonable presentation period; documents are obtainable.
- Costs allocation (confirmation, discrepancy, courier) stated.
- Transferability/assignment expressly stated if required.
- UCP/URDG/ISBP prevail over house addenda in case of conflict.

Bank counterparty policy:

We accept instruments issued/confirmed by the current Top-30 global banks by total assets (reviewed twice yearly). Acceptance remains subject to sanctions/AML status and Mezzarion discretion.

EVIDENCE ACCEPTANCE STANDARDS (RECAP)

- Proof of funds / RWA / BCL: bank letterhead or authenticated SWIFT; officer name + switchboard for call-back.
- Stock/production proof: third-party inspection or warehouse receipt; timestamped, geotagged photos acceptable as supplementary evidence.
- Mandate/authority: verifiable chain (corporate resolutions/owner attestations).
- Avoid editable PDFs without source files.

QUALITY & ASSAY DISPUTE PROTOCOL (TRADE/MINING)

- Primary inspection at load or discharge by independent inspector; ISO/ASTM method; stated tolerance.
- Three-lab “closest-two” rule if variance exceeds tolerance: Parties appoint Lab A and Lab B; if results diverge beyond threshold, Lab C (arbitration lab) decides; final payable quality = average of the closest two.
- Costs borne by party whose result deviates most (split if within threshold).
- Documented chain-of-custody; sealed split samples retained.

INTERMEDIARIES & FEES

- Intermediaries registered via NCNDA + Fee Letter; mandate chain verified before deal terms.
- All payees complete KYC before commission disbursement.
- Fees paid only via disclosed escrow/trust waterfall; no side payments.
- Optional exclusivity window (10–30 business days) post-NCNDA to protect genuine introductions.
- No undisclosed dual representation.

RESPONSIBLE SOURCING (ESG)

- Alignment with OECD Due Diligence Guidance; UNGPs.
- Baseline HSE/ESG attestations; corrective action plans where feasible; right to suspend/terminate where risks cannot be mitigated.
- ASM (where lawful): minimum entry bar (no child/forced labour; basic safety); progressive improvement plan; enhanced monitoring for early lots.
- Grievance channel available to stakeholders.

ANTI-FRAUD & COMMUNICATIONS SECURITY

- Name-match checks on bank accounts; independent bank call-backs via published switchboards.
- Email security (SPF/DMARC/DKIM); e-signature with audit trails.
- Sensitive documents exchanged only via secure portal.
- Reject mid-deal changes to bank coordinates or consignee absent verified cause.

DATA PRIVACY, SECURITY & RETENTION

- GDPR-grade baseline globally; lawful basis = contract and legitimate interests.
- Cross-border transfers protected by SCCs or equivalent.
- Typical retention (subject to local law): KYC 10 years; contracts 10 years; instruments 10 years; comms logs 5 years.
- Minimum-necessary data; encrypted storage; role-based access; breach notification pathways.
- DPO contact: [info@mezzarion.com]

EXCEPTION GOVERNANCE

- Exception Committee: Legal, Compliance, Risk/Treasury, Ops; Exec Sponsor as needed.
- Grounds: sanctioned/heightened-risk geographies; atypical instruments; accelerated timelines; concentration risk.
- Incident & stop-work triggers: new sanctions designation; unverified bank coordinate change; post-approval instrument text alteration; inspection refusal; adverse ESG/HSE incident. Immediate pause pending review.

- Records: rationale, mitigations, expiry/review date; exceptions are case-specific and non-precedential.

COMMUNICATION CADENCE & KPIs

- Status updates weekly by default; daily during instrument/shipment windows.
- KPIs: time-to-pre-screen; time-to-term sheet/FCO; first-pass compliance rate; exceptions rate; NPS/Customer Effort.
- 24/7 incident escalation path for time-critical shipments or instruments.

CONTACT & NEXT STEPS

- Start your engagement: [info@mezzarion.com]
- Fast-track call (≤ 30 min): request a slot via email
- Secure uploads: a protected link is sent after Stage 1.

LEGAL NOTICE

This is a customer-facing summary of our process. It is not legal advice. Binding obligations arise only upon execution of definitive agreements.