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POL-013: Client Intake, Onboarding & KYC Policy

Effective Date: 2026.05.01

Table of Contents

Purpose
This Policy establishes a structured, compliant, and auditable framework for client intake, onboarding, and Know-Your-Client (KYC) verification. It is designed to close identified gaps relating to undocumented intakes, incomplete client records, inconsistent identity verification, and premature work commencement.

Scope
This Policy applies to all prospective and existing clients of the Firm and binds all attorneys, legal officers, case progression officers, administrative staff, interns, and consultants involved in intake, onboarding, billing activation, or file creation.

Core Principles
No legal work may commence, court attendance undertaken, or billing activated unless the client has been properly onboarded, verified, and approved in accordance with this Policy. Client relationships must be capable of standing regulatory, audit, and evidentiary scrutiny at any time.

Client Intake Initiation
All matters must originate through a formal intake process. Verbal consultations, referrals, walk-ins, and informal communications do not constitute valid intake until recorded in Clio.

Mandatory Intake Information
At intake, the Firm must capture complete client particulars, matter description, jurisdiction, urgency assessment, fee structure, and conflict identifiers. Matters with incomplete intake data are not eligible for file opening or scheduling.

Identity Verification (KYC)
Every client must undergo identity verification prior to onboarding. This includes reliable identification documents, proof of address, and where applicable, corporate registration records, beneficial ownership details, and authority to instruct.

Enhanced Due Diligence
Enhanced KYC is required for high-risk matters, non-resident clients, politically exposed persons, unusual payment structures, or matters involving cash sensitivity, criminal exposure, estates, or fiduciary control. Such matters require supervisory clearance prior to acceptance.

Prohibited and Deferred Onboarding
The Firm shall not onboard clients where identity cannot be verified, inconsistencies remain unresolved, or instructions raise legal, ethical, or reputational concerns. Deferred onboarding must be documented and monitored.

Conflict Checks

All intake submissions must be screened for conflicts of interest prior to acceptance. Conflict clearance is a prerequisite to file opening, even where urgency is asserted.

Fee Agreement and Billing Alignment

No matter may proceed without an agreed fee structure documented in writing. Engagement terms must align with the Firm's billing policies before billing codes are activated.

Commencement of Work

Legal work, court attendance, filings, or communications with third parties may only commence after successful onboarding approval, conflict clearance, and KYC verification. Exceptions require documented senior approval.

File Opening and Matter Activation

A matter shall be deemed active only upon completion of intake, KYC verification, fee agreement execution, and system activation. Shadow files, parallel records, or informal matter handling are prohibited.

Record Retention and Accessibility

All intake and KYC documents must be securely stored, easily retrievable, and linked to the matter record. Missing or fragmented records constitute non-compliance.

Ongoing KYC and Updates

Client information must be kept current throughout the life of the matter. Material changes in client circumstances, instructions, or risk profile trigger mandatory review and potential re-verification.

Oversight and Accountability

Responsibility for intake and KYC compliance rests jointly with the handling attorney and designated intake personnel. Supervisory review is mandatory for all exceptions and escalations.

Breach of Policy

Failure to comply with this policy may result in corrective action in accordance with firm procedures, up to and including disciplinary measures.

Effective Date

This Policy takes effect on the date of formal approval and remains in force until amended or revoked.

Review and Updates

This policy will be reviewed periodically to ensure it remains aligned with operational needs, regulatory requirements, and best practices in client care.

Employee Acknowledgement and Confirmation

I, ____, acknowledge that I have received, read, and understood the contents of the **Client Intake, Onboarding and KYC Policy**.

I confirm that:

- I understand my obligations under this Policy and the standards expected of me;
- I agree to comply with the requirements set out herein and any related procedures, guidelines, or standard operating documents;
- I understand that failure to comply with this Policy may result in corrective or disciplinary action in accordance with organisational policies;
- I undertake to seek clarification where any aspect of the Policy is unclear.

I further acknowledge that this signed confirmation forms part of my official HR and compliance record in accordance with organisational requirements.

Employee Name: ____

Signature: ____

Date: ____

Position: ____