# Your KYC, finally done in minutes.

Colibri handles the volume. Your experts decide.

# Before business can start, the law requires one thing: a case file.

Before a firm takes on a client, it must find out who it is really dealing with. The law calls this customer due diligence. The industry calls it **KYC, know your customer**.

## Who must do this

- funds and their administrators
- fiduciaries and corporate services
- business centres
- law firms and notaries

→

REQUIRED BY LAW

### The case file

- identity
- owners, layer by layer
- source of wealth
- risk

→

## Once the file is done

### Business begins:

an investor accepted · a company formed · a mandate signed

## Until then, everyone waits

- the client: the deal on hold
- the firm: revenue waiting
- the expert: stuck on paperwork

One duty, across the European Union.

**No file, no client.**

THE VOLUME

# The law requires millions of case files a year. Every one built by hand.

Every new client starts with a case file. Here is how many begin each year, and what one file takes to build by hand.

### What starts a case file

- an investor subscribes to a fund
- a company is created
- a mandate begins with a lawyer, a notary or a fiduciary
- a member joins a business centre

→

### How many, every year

Millions of case files, every year.

about **390,000**
investor files in Luxembourg

**916,015**
new companies a year in the EU

and every file comes back: redone at least every 5 years, every year for higher risk

### What one case file takes, by hand:

**Chase**
email the client. Wait. Ask again.
BY HAND

**Read**
hundreds of pages, name by name, date by date.
BY HAND

**Type**
every fact copied into the system, checked twice.
BY HAND

**Check**
every name against the world's sanction and watch lists.
BY HAND

**Assemble**
one file, ready for the day an inspector asks.
BY HAND

One case file takes an afternoon to days of skilled work.

**Millions of files take entire teams.**

THE GAP

# Every tool solves its own step. A person still runs the process.

A person still sits between the tools. They decide what to ask, read what comes back, and connect the results into one file.

## Already solved

### Identity
A face is matched, a passport is scanned, a database is checked. It takes seconds and costs cents.

### Screening
Every list is checked in an instant. The hits still land on a person's desk.

### Risk scoring
Scoring engines exist. Each firm scores risk its own way, so someone still sets the engine up by hand.

### Collection portals
Portals collect documents. They do not read them. Reading, comparing and chasing stay with a person.

## The gap

### AI that runs the file
NEW

- decide what the file needs
- chase it
- read what arrives
- tie each fact to its proof
- know when the file is done

Colibri AI knows the law.

It is grounded in more than 8,000 legal provisions.

Colibri AI does not hallucinate.

Colibri does not use AI to make answers up. It picks the best fitting answer from a set written in advance.

2027

The rules get stricter: **Europe's new anti-money-laundering rules apply from 10 July 2027**. The same duty, tightened, across the European Union.

More work every year. **Not more people.**

WHO IS BUILDING THIS

# We have built compliance AI before. And we have done KYC ourselves.

Two founders who build AI for regulated finance, and two practitioners who have done the job.

**Nicolas Moreno**
**Co-founder · CEO & CTO**
PhD in Finance / Machine Learning, HEC Liège

**Nikita Gaponiuk**
**Co-founder · COO & CTO**
PhD Economics, University of Luxembourg

met in advisory work

2022–25
**Forvis Mazars**
grew the modelling team from 0 to 5 people; about €300,000 a year, recurring

2024
**Guichet.lu**
AI search for the Government of Luxembourg, won in an open tender

2025
**Marcus AI**
Forvis Mazars' compliance AI assistant, built by us. More than 24 regulatory frameworks, including anti-money-laundering

Colibri
2026

Two senior practitioners from a **top-tier Luxembourg transfer agency**. More than **8,000 KYC files** between them.

People who have done the job, and people who have built the software. **One team has done both, from day one.**

WHAT COLIBRI IS

# Colibri runs the process. Your experts decide.

Shown on an investor file. The same five steps run any file the law demands.

**IN**

documents, as they arrive

▸

**STEP 01**

## the rulebook

reads your policy clause by clause and turns it into the rules it applies. Never below the law.

▸

**STEP 02**

## the portal

works out what to ask each client, sends one link, and chases until everything arrives.

▸

**STEP 03**

## the engine

reads every page, draws the ownership chain and checks every name. Every fact cites its source.

▸

**STEP 04**

## the judgment

brings each call to your expert, with the case built and the evidence one click away.

▸

**STEP 05**

## the audit

assembles the file as the work happens: outcome, documents, conditions, every act recorded.

▸

**OUT**

one complete file, ready for the inspector

Chase, read, type, check, assemble: **Colibri runs all five.**

The next five slides show each step.

YOUR PART · your policy · your approval

# Your policy becomes the rulebook, in minutes.

- Drop your policy in. AI reads it. Every rule shows the sentence it came from.
- Your thresholds are taken as written. Clauses below the law are refused, and you see each one.
- The review takes 30 minutes, once. A named person signs before anything runs.

Colibri runs your rules, not a vendor's template.

▶ **Watch step 1 run** · 39 s

Colibri | Vantis ▾ | Rulebook ▾ | policy intake | Camille Rossi · MLRO

RULES

## Vantis.Policy.pdf

AML / KYC policy · 38 pages · read once · 41 rules set

AML / KYC POLICY · VANTIS — page 22 of 38

**PART VII — SOURCE OF WEALTH AND SOURCE OF FUNDS**

**7.1 Establishing source of wealth**

Source of wealth shall be established and corroborated for any subscriber whose aggregate commitments to the Fund equal or exceed EUR 500,000.

Corroboration is documentary. A subscriber's own statement, standing alone, does not establish source of wealth for the purposes of this Part.

**7.2 Politically exposed persons**

For politically exposed persons, corroboration of source of wealth may be deferred where aggregate commitments remain below EUR 250,000.

**7.3 Source of funds**

The origin of the subscribed monies is traced to a named account in the subscriber's name, and the trace is recorded on the file.

Where the monies are received from a third party, the relationship between that party and the subscriber is established and documented before the subscription is accepted.

**7.4 Delegated monitoring**

Where monitoring is delegated, the agreement states the checks performed, reporting cadence, and escalation route.

A revisited assessment supersedes its predecessor. The superseded assessment is retained on the file with the date on which it ceased to apply.

**7.7 Oversight**

The appointed compliance officer confirms responsibility for AML/KYC oversight in a dated declaration.

YOUR POLICY VS OUR BASELINE — stricter – taken as written

**When source of wealth must be corroborated**

| | |
|---|---|
| YOURS | EUR 500,000 |
| OURS | ~~EUR 1,000,000~~ |
| WRITTEN AT | Vantis.Policy.pdf §7.1 · p.22<br>mrbg.amount_threshold.wealth_and_funds.v1 |

HOW YOUR 41 RULES LANDED

| | | |
|---|---|---|
| Same as the Colibri default<br>nothing to change | 38 | |
| **Stricter than the Colibri default**<br>your wording governs the file | 2 | applied as written |
| **Below the legal minimum**<br>Law of 12 Nov 2004 · Art. 3-2 | 1 | not applied |

Rulebook v1 · **in force** — signed Camille Rossi, MLRO · 11 Sep 2026 · 09:41 CET

YOUR PART | open the case

# Colibri chases the documents. Not you.

- Your investor gets one link. They drop everything there: any file, any format.
- Colibri reads each document and checks it against your rulebook. When a bill is too old, or a new owner appears, it asks for the right document.
- Every request is in plain words, never your policy. Colibri follows up until the case file is complete.

The chase stops here.

▶ Watch step 2 run · 48 s

Colibri | Vantis ▾ | Documents ▾ | LetzInvest S.à r.l. · KYC-26-LU-0024839 | Camille Rossi · MLRO

CASE

## LetzInvest S.à r.l.

Corporate · Luxembourg · subscribing to Kestrel Horizon SICAV-RAIF · file opened 14 Sep 2026

**Drop your documents here**
The investor drops them in any order, in any format. Colibri works out what is what.
Choose files

WHAT A COMPANY GIVES US — 10 asked at the start · **1 added by Colibri**

| | |
|---|---|
| Cert_Incorporation_LetzInvest.pdf · 1.2 MB<br>**Certificate of incorporation** | Accepted |
| Articles_LetzInvest_2024.pdf · 22 pages<br>**Articles of association** | Accepted |
| Share_register_LetzInvest.pdf · dated March 2024<br>**Current share register** | Needs a fresh copy |
| not sent yet<br>**Board resolution authorising the investment** | Waiting |
| not sent yet<br>**Proof of signing authority** | Waiting |
| not sent yet<br>**List of current directors** | Waiting |
| not sent yet<br>**Organisational chart of the ownership** | Waiting |
| not sent yet<br>**FATCA / CRS entity classification** | Waiting |
| 1 of 2 people done<br>**Identity of every owner above 25%** | Waiting |
| Subscription_LetzInvest_AC.pdf · 14 pages · read to the end<br>**Signed subscription agreement** | Accepted |

page 4 declares a second UBO

| | |
|---|---|
| added by Colibri · 15 Sep 10:44 · nobody typed this<br>**Passport or national ID — Bernadette Dumont** | new |

Case KYC-26-LU-0024839 · **open** — portal link sent 14 Sep 09:12 · reminder due 17 Sep · deadline 25 Sep

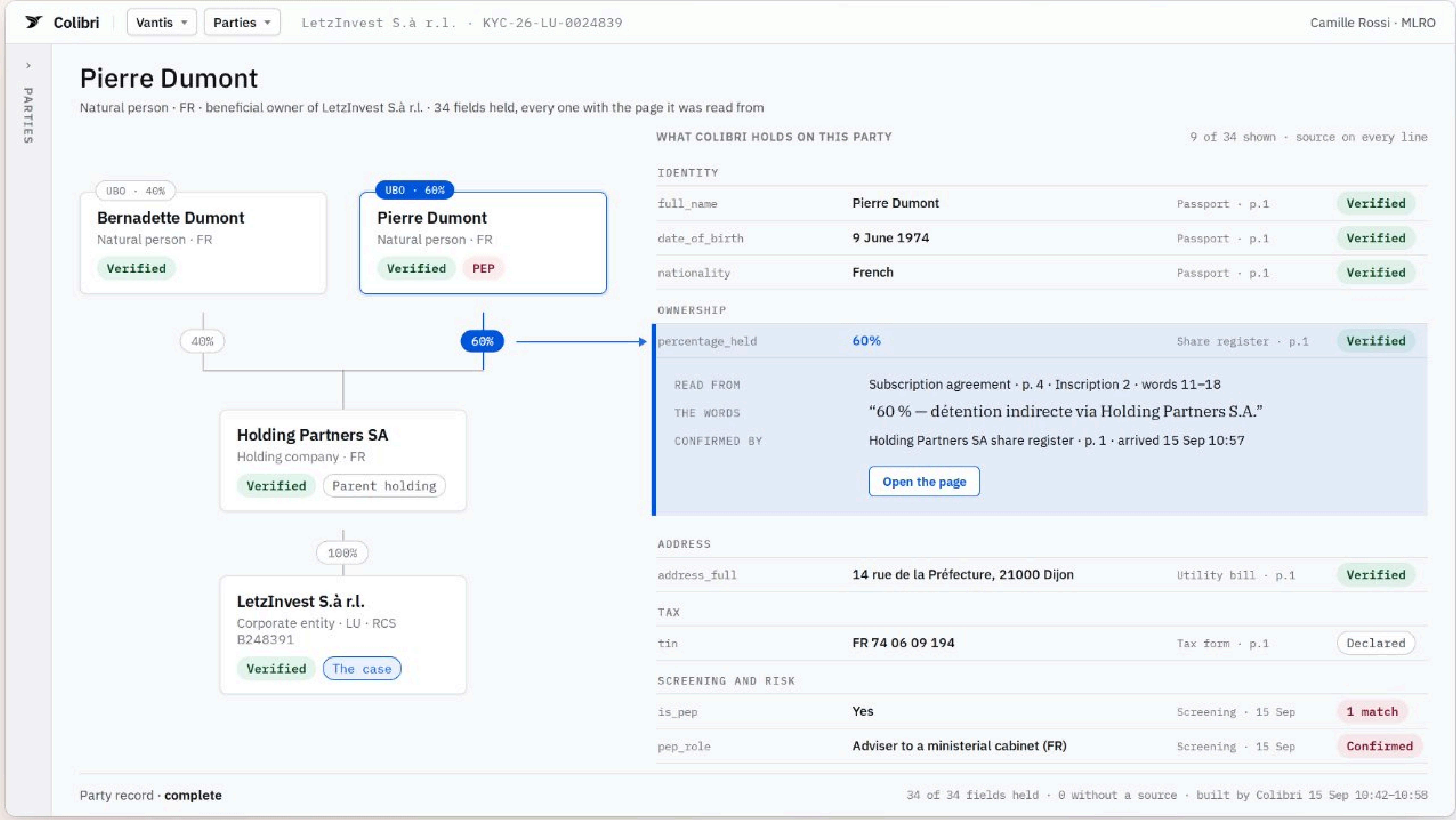
YOUR PART —

# Colibri ties facts to sources. Proof is easy.

- Facts carry the page and the exact words they were read from.
- A declared owner appears dashed until a document proves it and turns the box solid.
- Screening runs and a rating is recommended before your team opens the file.

Screening results and risk ratings carry their sources too.

Watch step 3 run · 56 s



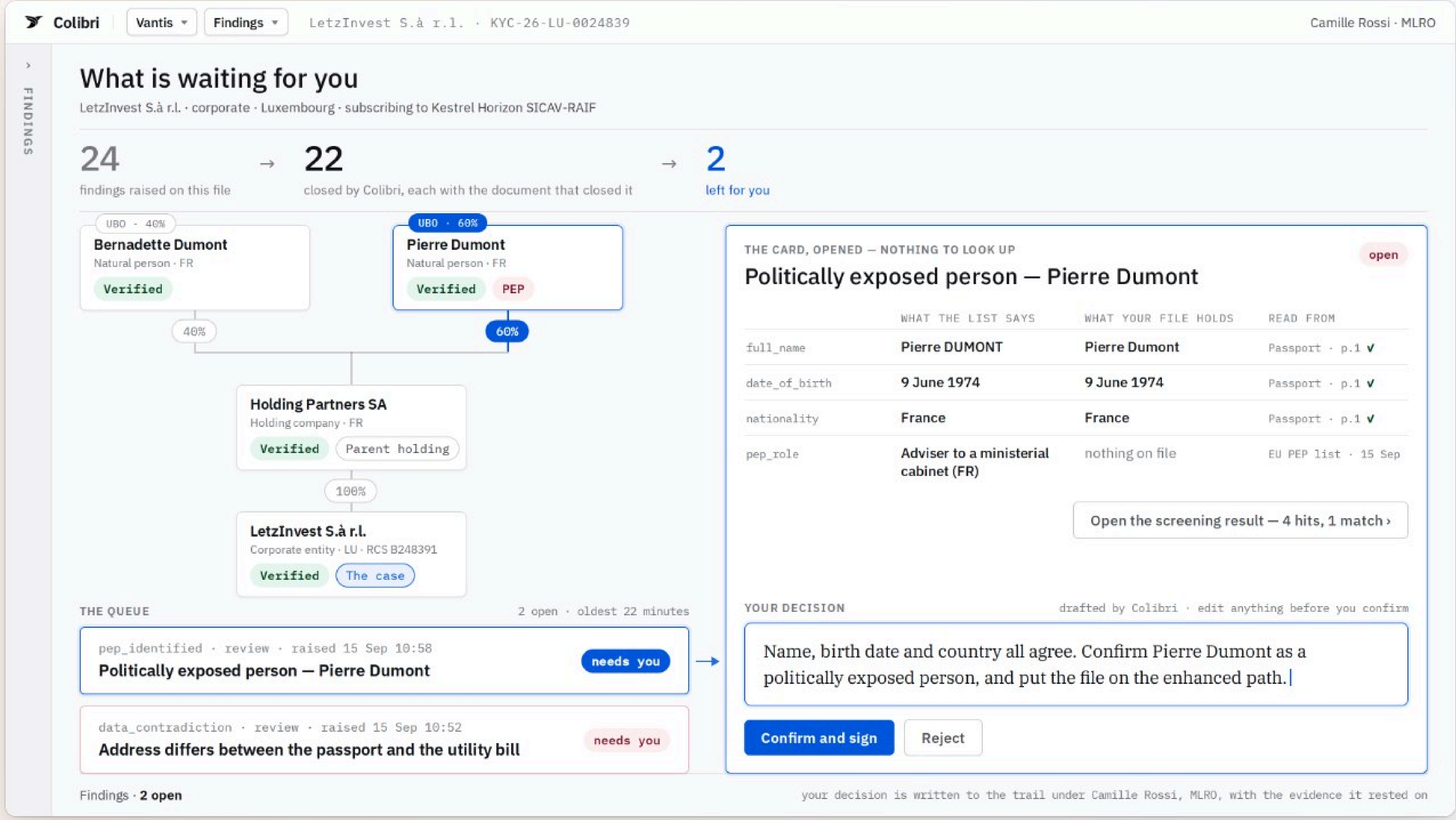
YOUR PART your judgment

# Your only job is to take the decisions Colibri cannot.

- A screening hit arrives as a prepared case: the finding, the evidence side by side, and a drafted decision.
- You confirm, reject, or edit the draft. Nothing arrives without a recommended action.
- Your decision is recorded under your name, with the evidence it rested on.

You start at the decision, not at page one.

▶ Watch step 4 run · 54 s



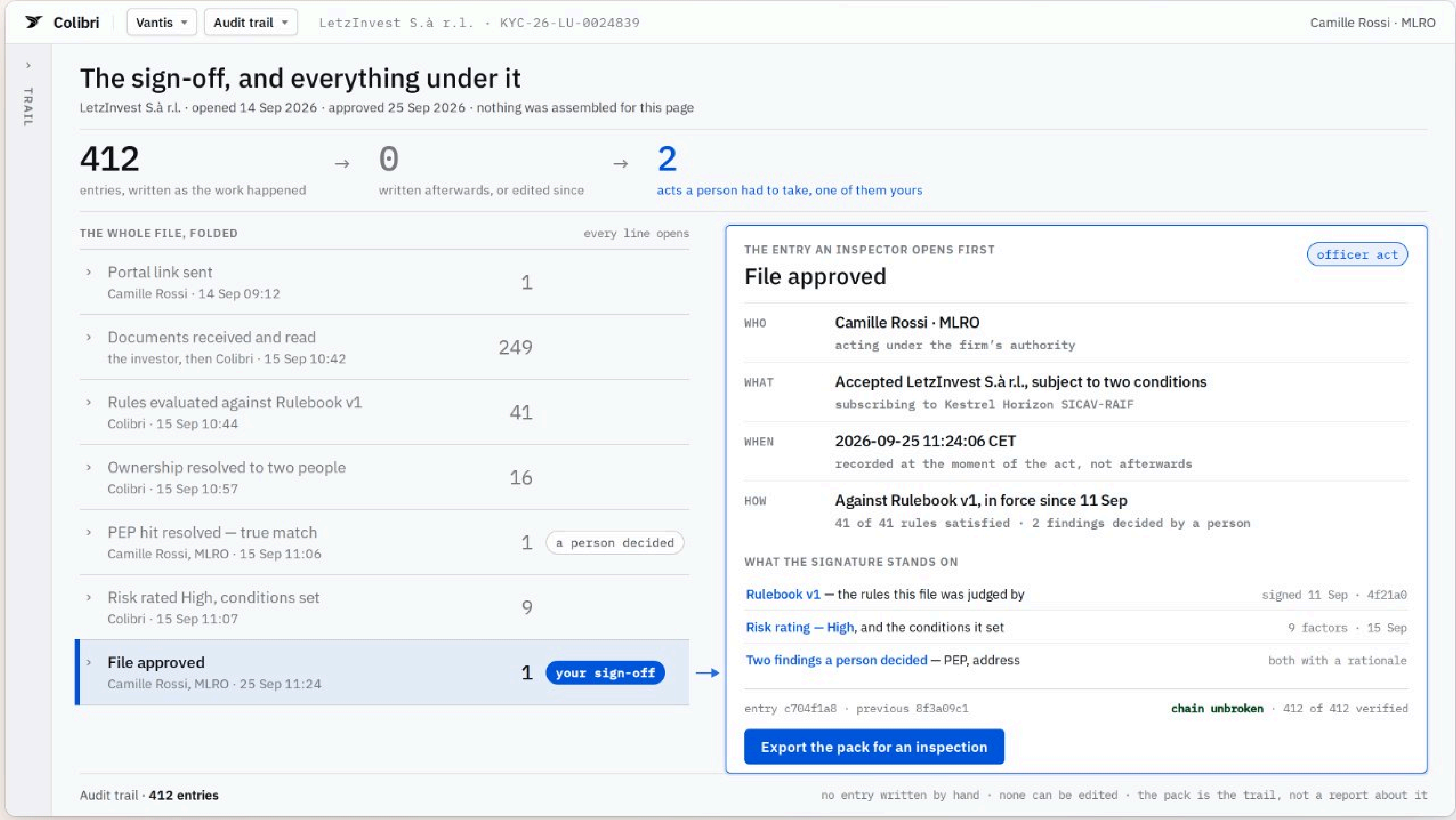
YOUR PART your sign-off

# Colibri captures everything an inspector needs to know.

- The file assembles itself as the work happens. You never rebuild it before an inspection.
- Each entry names who decided, what they decided, and when.
- Every decision links to the evidence it rested on. Nothing goes missing.

The audit trail carries who decided what, when, and on what evidence.

▶ Watch step 5 run · 35 s



WHAT THIS BUYS

# Hours by hand become minutes with Colibri.

Fund-industry investor files, at four levels of difficulty. Time and complexity vary for other professions.

| BY HAND<br>hours per file | | | WITH COLIBRI<br>minutes per file |
|---|---|---|---|
| Straightforward case | ~2h | → | ~20 min |
| Standard case | ~8h | → | ~42 min |
| Complex case | ~15h | → | ~75 min |
| High-risk case | ~22h | → | ~120 min |

FOR 1,000 STANDARD FILES A YEAR
in FTE

| | | |
|---|---|---|
| BY HAND | ~5 FTE | five analysts, full time |
| WITH COLIBRI | ~1 FTE | one analyst, not five |

## Why it compounds

The law makes the work repeat: every case file is redone every 1 to 3 years.

With Colibri, your client book can grow without hiring more people.

These numbers are estimates.

We prove them on your files, **before you pay anything**.

WHERE THIS GOES

# Roadmap.

Today

## Pieces of it, working

What you have just seen. Built, and being built on.

October 2026

## Test-ready

A full investor file, end to end, on your documents.

February 2027

## First pilot in production

Live files, under a service agreement.

BACK TO BUSINESS

# We are taking a small number of pilot partners.

Three steps from a first meeting to live files. The first one costs an hour.

SEPTEMBER

## Meet

One hour, in person. Your volumes, your policy, your blockers.

Contact us →

OCTOBER

## Test

Your own documents, in the room. Free, nothing retained. Not convinced? Stop here.

FEBRUARY

## Go live

Paid service agreement. Priced per investor onboarded.

You pay per investor file Colibri processes. **No seats, no platform fee.**

No cost and no commitment until you decide to go live.

REFERENCE · SKIP OR NAVIGATE

# Corporate Appendix.

APPENDIX A · PICK ONE, OR SKIP THE BLOCK

# Questions we get asked.

### TRUST AND DIFFERENCE

01 How are you different from Fenergo, Cascade and the rest?

02 Why can you trust the analysis?

03 How do you use AI, and what stops it from hallucinating?

### YOUR POLICY, YOUR RULES

04 We drop a policy and Colibri presets itself. What exactly do we sign?

05 How accurate is it, and how would we know?

### RESPONSIBILITY AND THE LAW

06 Who is responsible for what?

### ASSURANCE, EXIT AND COMMERCIALS

07 Where does our data live, and who can see it?

08 Certifications: ISO 27001, GDPR, DORA?

09 What happens if we stop, or if Colibri disappears?

10 What does it cost?

# How are you different from Fenergo, Cascade and the rest?

## Fenergo and Cascade sell you a workflow builder. Colibri sells you the analyst.

Most KYC platforms are a well-made form. You assemble the workflow before launch, then your people fill it in.

- Why assemble workflows, when Colibri reads your policy and assembles them itself?
- Why chase documents, when Colibri already knows which one is missing and from whom?
- Why key in data, when Colibri extracts it with the source quote attached?
- Why stay late on the tasks nobody enjoys, when Colibri works every shift?

# Why can you trust the analysis?

## Because it is not our opinion. It is grounded in the law, line by line.

We read every AML and KYC obligation in Luxembourg and EU law, and wrote it down:

- Colibri knows **more than 100 laws and regulations**, and the **more than 8,000 legal provisions** inside them that an AML officer must work from. Each one is checked word for word against the official text.
- Colibri knows which AML duties the law leaves to your business judgement, and which it does not.
- Colibri knows if your policy missed one.
- Any rule in your policy we cannot trace back to a law is flagged as an extra requirement, and **treated by our team**.

# How do you use AI, and what stops it from hallucinating?

## Colibri uses AI to navigate a fixed set of workflows. It never invents one.

- **Every fact carries its source.** A quote and a link back to the exact place in the raw document. You can open it, challenge it, correct it.
- **When Colibri hesitates, it stops and asks you.** It never picks a path to get past a doubt. If it hesitated, there was a reason worth a person looking at it.
- Colibri can still take a wrong path, or work from a wrong fact. What it cannot do is do it quietly. You see the basis it used, and you can correct it.

# We drop a policy and Colibri presets itself. What exactly do we sign?

## Your own settings, written in plain language, before anything runs.

Colibri reads your procedures manual and turns it into settings: which documents you accept, how old a document may be, your thresholds, what raises a risk score, how often you review, when a case goes up the chain.

- You see each setting next to the sentence in your policy it came from
- You confirm, amend or reject, item by item
- Each signed version is kept, and every file records which version of your rules it was checked against
- **Roughly 30 minutes.** Where your policy is silent, Colibri asks rather than assumes.

# How accurate is it, and how would we know?

## You measure it, on your own files, before you commit.

During the test phase both of you work the same files. Your analysts do the job they would do anyway; Colibri does it alongside; you compare the two.

- **How often you agreed**: same conclusion, same file
- **How often your analyst overruled it, and why**: Colibri misread the document, read your policy differently, or found something real
- **Time per file**: measured, not estimated

Numbers produced by your people on your files. Not our benchmark.

# Who is responsible for what?

## Your AML obligations are yours. By law they cannot be transferred to us.

- **Colibri is responsible for the software**: that it works as specified. Not for the consequences of how it is used.
- **We walk you through every Colibri workflow before you start.** It matters to us that you know exactly **where Colibri ends and your job begins.**

# Where does our data live, and who can see it?

## In the EU. In your own copy of Colibri. Never in anyone else's.

- **Your own copy of Colibri, used by nobody else**: inside your own cloud account, where you hold the keys and nothing leaves your environment; or on ours, if you prefer
- **Our first priority is that your data cannot reach anyone else**: not another client, not another account, not another officer. Built that way, not just promised that way.
- **The AI itself runs on servers inside the EU.** Nothing is cached, nothing is stored, and nothing your files contain is ever used to train a model, ours or anyone else's.

# Certifications: ISO 27001, GDPR, DORA?

## None yet, and we would rather say so.

Colibri holds **no certifications** today.

- Built to **ISO 27001** standards from the start; certification work planned **December 2026 to March 2027**
- **GDPR and DORA** compliance to be formalised **Q1 2027**
- This does not reduce the due diligence you owe on us. It does mean we will make that due diligence as straightforward as we can.

# What happens if we stop, or if Colibri disappears?

## You never have to ask us for your files back. They are already yours.

- **Every file you sign off has already left the platform**: a complete pack in your own archive, in a format any system can open: the findings, the decisions, the source quote behind each fact, and a fingerprint proving nothing has been altered since.
- What stays with us is a temporary working copy. Nothing you need is held here.
- If you stop, we delete our working copies and confirm the deletion in writing. Nothing to wait for, nothing to return.
- **No lock-in. No auto-renewal.**
- If you have specific data retention or business continuity needs, let's have a discussion.

# What does it cost?

## Per business relationship you actually KYC'd. Nothing else.

- **You do not pay per user.** No platform fee. No minimum volume.
- You pay for onboarded investors and for periodic reviews performed, the unit your own business is measured in.
- Connecting Colibri to your systems is quoted separately, once, against an agreed scope.
- **Your price is the September conversation.** We would rather work it out against your real volumes than hand you a rate card.

APPENDIX B

# Selected projects.

# Marcus AI.

Built by this team.

**Marcus** is Forvis Mazars' AI assistant for compliance, and we built it.

It **finds compliance gaps across 24 regulatory domains** and cuts a policy review **from weeks to minutes**. It also works against regulation that is not yet in force: the **AIFMD II** regime, which applies from 16 April 2026, and the **AML package** of AMLR and AMLD6, from 10 July 2027. It reads a firm's policies against those standards and flags where they fall short. The firm's experts then validate the result and finalise the strategy.

Marcus went to market. Forvis Mazars in Luxembourg ran public live demonstrations of it in December 2025 and April 2026, and it is the compliance product the firm puts its own name to. We took it from an idea to a launched product with a small team.

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This team has taken a compliance AI from idea to public launch.

# Guichet.lu.

Winning a government tender with the best prototype of a semantic search engine, then building the production-level design and documentation

The Ministry for Digitalisation and the Government IT Centre (CTIE) ran an open competition to replace keyword search across the Luxembourg State's citizen portal: roughly **2,000 administrative procedures**, in several languages, searched by people who misspell things and do not know the official term for what they need. The partnership was called **Semantifynd**.

We built a working prototype and won the competition, against **AKABI, Devoteam, Lingua Custodia and Sia Partners**.

At a later stage we led a **six-month project** to produce the *cahier des charges*, the architecture, the full technical documentation, the mockups and the benchmarking, to the standard a State IT centre will accept and maintain.

---

We have worked with an organisation as large as CTIE, and adapted IT solutions to their technical standards and governance needs. We can do the same for you.

APPENDIX C

# Services.

APPENDIX C

# Two lines. The software, and the people who do the work.

KYC SERVICES: RECURRING COMPLIANCE WORK, TAKEN ON FILE BY FILE

**Onboarding and periodic reviews**
Initial files and scheduled refreshes, prepared to your procedures

**Ongoing monitoring and screening**
Sanctions, PEP and adverse media, with every hit closed in writing

**Risk scoring**
Client risk assessments with the inputs shown, not just the result

**Reporting**
Management and regulator-ready reporting on the state of your files

**Backlog clearing**
A stalled remediation queue worked down file by file, with progress you can count

**Policies and procedures**
AML and KYC policies drafted for your activity and your supervisor

**Gap analysis**
File-level findings, written up for your second line of defence

DIGITAL SERVICES: WHERE YOUR PROCESS REPEATS, WE BUILD THE TOOLING THAT RUNS IT

**Automated operational controls**
Recurring manual checks become scheduled, logged controls

**Digitised contracts and forms**
Paper and PDF become structured data your systems can read

**Tailored onboarding**
An onboarding flow built around your process, not a generic portal

**Client databases**
One clean, queryable record of your client data

**On-demand development**
Small internal tools, built to remove a specific bottleneck

APPENDIX D

# Company details.

APPENDIX D

# Colibri.

| | |
|---|---|
| Legal name | Colibri |
| Legal form | *Société par actions simplifiée* (SAS) |
| Registered office | 130, boulevard de la Pétrusse, L-2330 Luxembourg, Grand Duchy of Luxembourg |
| Incorporated | 4 August 2026 |
| Supervisory status | **Not a CSSF-supervised entity.** Not a PSF. |
| Contact | contact@colibri-kyc.com<br>www.colibri-kyc.com<br>+352 661 153 981<br>linkedin.com/company/colibri-kyc |

# Important notices.

| | |
|---|---|
| **Regulatory status.** | Colibri is not authorised or supervised by the CSSF or by any other financial-sector supervisory authority. Colibri does not hold, and does not require, a licence under the amended Law of 5 April 1993 on the financial sector for the activities described in this document. Colibri supplies software and related professional services. |
| **AML/CFT responsibility.** | Obligations under the amended Law of 12 November 2004 on the fight against money laundering and terrorist financing rest with the obliged entity and cannot be transferred by contract. Colibri does not assume, and does not purport to assume, any part of the recipient's AML/CFT obligations. All decisions on customer acceptance, risk rating, screening disposition and reporting remain with the recipient's own staff. |
| **No advice.** | This document is for information only. It is not legal, regulatory, tax, accounting or investment advice, and it is not an offer or a solicitation. Recipients should obtain their own professional advice before acting on anything in it. |
| **Product status and forward-looking statements.** | The Colibri platform is under development. Screenshots and functional descriptions illustrate work in progress and may change. Dates, roadmaps, capacity figures and savings estimates are targets and good-faith estimates based on information supplied by the recipient. They are not commitments, guarantees or contractual undertakings. Certification, compliance-formalisation and availability dates are planning targets. No contractual relationship arises from this document; only a signed written agreement creates obligations between the parties. |
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