

LEI Adoption for Enterprise KYB and Subscription Onboarding

EMJ.NEXUS global enterprise policy update

Issued by EMJ.LIFE / EMJ LIFE HOLDINGS PTE. LTD.

Version 1.0 | Policy effective 15 October 2026

Applicable to controlled enterprise invitations from 24 October 2026

1 Policy announcement

EMJ.LIFE is adopting the Legal Entity Identifier (LEI) as the primary external reference for identifying legal entities during the first stage of enterprise Know Your Business (KYB) checks for EMJ.NEXUS. The policy takes effect on 15 October 2026 and applies to controlled enterprise invitation onboarding beginning on 24 October 2026.

D-U-N-S becomes optional supplementary information in the second stage. It is not a prerequisite for subscription, EGC ID issuance, completion of the required enterprise profile or the initial allocation of 200 E-IPP Points. The core onboarding process does not depend on integration with D&B data services.

This notice also sets out when subscribers read and accept the eight commercial documents, how LEI statuses are handled, and what must be completed before the initial points allocation is issued.

2 Why this change matters

EMJ.LIFE provides Pre-Disclosure Evidence Infrastructure. A clearly identified legal entity is the starting point for attributing enterprise activities, records and evidence. A brand name, group name or email domain alone cannot reliably distinguish subsidiaries or entities registered in different jurisdictions.

Using LEI reference data provides a publicly checkable basis for comparing the subscribing entity with its legal registration details. Recording the source, retrieval time and relevant statuses supports later review of how identity was established. The LEI remains distinct from the EGC ID used within EMJ.NEXUS.

Publishing these rules gives enterprises a clear account of the applicable policy and dates. It also explains why identity checks, document acceptance, payment, identifier issuance and service permissions are separate steps.

3 Scope

This policy applies to enterprise subscriptions and controlled enterprise invitation onboarding for EMJ.NEXUS. Schools and individual participants follow their respective admission rules. It is an EMJ.LIFE platform policy, not a regulatory requirement for every enterprise worldwide to obtain an LEI.

4 First stage identity checks and subscription

The invited enterprise provides its legal name, LEI and invited email address. EMJ.LIFE checks the entity against public GLEIF records and verifies the invitation and control of the email address. The source update date, retrieval time and verification outcome are retained. The LEI must identify the actual subscribing legal entity, rather than another member of its group.

After passing KYB, the subscriber reads the Enterprise Order Form (OF) and actively selects its acceptance checkbox before proceeding to subscription plan selection. This acknowledgement does not itself select a plan, authorise a charge or confirm payment. The selected plan, annual fee, applicable taxes, currency, scope and total payable amount are presented for confirmation of the transaction.

A formal EGC ID is issued or associated once the agreement is effective and subscription payment is confirmed. Incomplete second-stage information does not, by itself, prevent EGC ID issuance when those conditions have been met. The EGC ID identifies the enterprise within EMJ.NEXUS; it does not replace the LEI or a statutory registration.

5 Reading and accepting the eight documents

The eight commercial documents retain their version 1.0 terms dated 12 October 2026. The table below specifies when each must be read and accepted during onboarding.

Code	Commercial document	When acceptance is required
OF	Enterprise Order Form	After KYB and before plan selection
MCT	Master Commercial Terms	Second stage
DPA	Data Processing Addendum	Second stage
SEC	Security Schedule	Second stage
SLA	Service Level Agreement	Second stage
DRE	Data Rights & Exit Schedule	Second stage
EIPP	E-IPP Points & Score Policy	Second stage
CPS	Enterprise Digital Behaviour Evidence Compendium Schedule	Second stage; optional purchase is separate

Each document is provided in full with its version and download option. Acceptance requires an active checkbox and is recorded separately for each document. Checkboxes are not preselected. The first-stage OF acknowledgement does not replace the seven second-stage acknowledgements.

Accepting CPS acknowledges the terms applicable to a separately requested optional service. It does not place an order, authorise a charge or authorise publication of evidence.

6 Second stage enterprise information

The second stage completes the enterprise profile and the seven remaining document acknowledgements. Information already obtained from GLEIF is carried forward with its source, rather than requiring the subscriber to enter it again. The required profile consists of these 14 fields.

No	Required field	No	Required field
01	LEI	08	Entity status
02	Full legal name	09	Entity creation date
03	Legal jurisdiction	10	Operating address
04	Registration number	11	Applicable tax identifier
05	Registration authority	12	SICS Code
06	Legal registered address	13	SICS Name derived from the code
07	Legal form	14	Supply chain role

All 14 fields must have a valid completion outcome. Where a tax identifier is legally inapplicable or a source field is missing, the applicability decision or the supporting resolution must be documented under the controlled completion rules. Unresolved blanks and invented values do not constitute completion. Unknown identity information cannot substitute for a verifiable LEI and legal entity.

D-U-N-S is an optional fifteenth field. Leaving it blank does not prevent completion of the required profile or the initial points allocation.

7 Initial allocation of 200 E-IPP Points

The initial allocation is issued only when all four conditions have been satisfied for the same enterprise:

- Subscription payment has been confirmed.
- A formal EGC ID has been issued or associated.
- All 14 required profile fields have valid completion outcomes.
- MCT, DPA, SEC, SLA, DRE, EIPP and CPS have each been read and actively accepted.

The allocation is issued once. Resubmitting a form or payment notification, adding D-U-N-S later, signing in again, renewing or upgrading does not create another initial allocation. Points issuance, available balance, service activation and task permissions are assessed separately.

8 Information supplied by EMJ.LIFE

EMJ.LIFE supplies the applicable processing locations, subprocessors, independent recipients, cross-border arrangements and security information for subscribers to read and acknowledge. Subscribers are not required to complete service-provider disclosures on EMJ.LIFE's behalf. Enterprise data processing workflows that require EMJ.LIFE to act as a processor are enabled only after the DPA and necessary processing or transfer arrangements are effective.

9 LEI status acceptance rules

EntityStatus and RegistrationStatus are recorded separately. The meanings below follow GLEIF terminology [1]. The handling rules describe EMJ.NEXUS policy; an LEI status alone does not establish that all onboarding or due diligence requirements have been satisfied.

Registration status	Meaning	EMJ.NEXUS handling
ISSUED	Validated and issued	Usable as an identity reference, subject to entity matching, current data and invitation checks. It is not automatic approval.
LAPSED	Renewal overdue	Retain traceable identity reference, request renewal and review data currency. Restrict new tasks and evidence pending renewal.
PENDING_VALIDATION	Application under validation	Identity verification is incomplete. Verify again after issuance.
PENDING_TRANSFER	Transfer requested	Check the same LEI against current records; review where necessary. Transfer alone does not establish cessation.
PENDING_ARCHIVAL	Transfer awaiting completion	Review the transfer and obtain the current record. Do not interpret this status as entity dissolution.
TRANSFERRED	Managing issuer changed	Follow the same LEI to the current managing record. Do not rely on the former issuer's record as the current status.
DUPLICATE	Non-surviving duplicate	Do not use as the current identifier. Identify and verify the surviving LEI.
ANNULLED	Erroneous or invalid after issuance	Do not accept as a valid current identifier. Resolve the correct identity.
CANCELLED	Abandoned before issuance	Do not treat as proof of an issued LEI.
RETIRED	Ceased operating without a merger	Do not accept as an operating entity for new activities. Verify any succession separately.
MERGED	Entity merged into another	Deprecated historical status. Verify the successor and retain the original attribution of historical evidence.

An ACTIVE entity status is required for new tasks and evidence. INACTIVE blocks new activities. NULL means not applicable and is not equivalent to ACTIVE. Missing, unknown or conflicting results require a documented review rather than an assumed pass or a finding that the entity has ceased operating.

LAPSED is not INACTIVE. Overdue LEI renewal does not itself prove that the enterprise has stopped operating. Under this policy, the identity record remains traceable while new activity is restricted pending renewal and review.

A lookup failure, timeout, inconsistent renewal date or unrecognised status does not count as successful verification. An enterprise without a verifiable LEI must obtain one and complete the identity checks; optional D-U-N-S information is not a substitute. Transfer states remain subject to current source checks and all other activity permissions.

10 Changes in identity and historical records

Enterprises must notify EMJ.LIFE of material changes affecting their legal identity. Verification records retain the source, retrieval time, relevant statuses, policy version and decision basis. Periodic source checks do not guarantee real-time detection of every change.

A renewal issue or identity restriction does not automatically terminate the agreement, revoke an issued EGC ID, forfeit legitimately held points, reset historical Score or delete existing evidence. The affected functions, reasons, source time, corrective steps and restoration outcome are recorded separately. Retention remains subject to applicable law, the DPA and exit provisions.

A merger or succession does not automatically reattribute historical evidence to another entity. The original entity, effective date and verified succession relationship must remain traceable. Activities or continuity during a restricted period must not be reconstructed as though the restriction had not applied.

11 Service permissions and responsibility

New tasks and evidence also require completed information, an effective service entitlement and the applicable role, Node, plan and feature permissions. An ISSUED LEI or an EGC ID does not, by itself, enable every function.

LEI checks support legal entity identification and platform admission. They do not establish completion of all beneficial ownership, anti-money laundering, sanctions, credit or other legally required checks. Control of an email address alone does not establish authority to represent the enterprise. Authorisation and acceptance must be attributable to the enterprise.

KYB, an EGC ID, document acknowledgement, E-IPP Points, a DOI or platform participation does not establish that enterprise content, sustainability claims or evidence quality has been audited, assured, certified or approved by a regulator. Use of public LEI data does not imply endorsement by GLEIF, ISO or another institution, or that EMJ.LIFE is an LEI issuer or accredited Validation Agent.

12 Effective dates and publication record

The policy is effective on 15 October 2026 and applies to controlled enterprise invitation onboarding from 24 October 2026. These dates are separate from individual contract effectiveness and actual feature activation. This notice does not itself confirm that every payment, identifier, points or task function has been activated. Changes to existing executed agreements follow the applicable contractual procedure.

Any DOI assigned to this notice identifies the published policy version for reference and citation. It does not constitute third-party approval of the policy or participating enterprises. Later revisions retain their version and change history; website updates do not silently replace previously recorded acceptance.

Official references

[1] GLEIF. Level 1 Data: LEI-CDF Format 3.1.

<https://www.gleif.org/en/lei-data/access-and-use-lei-data/level-1-data-lei-cdf-3-1-format>

[2] GLEIF. How to use LEI Search.

<https://www.gleif.org/en/lei-data/lei-search/about-lei-search/how-to-use-lei-search>