

Anti-Money Laundering and Know Your Customer Policy

Preamble

The present Anti-Money laundering policy (AML policy) is drawn up in accordance with the applicable legislation and was created in order to implement the required rules and guidelines to prevent any possible activities by the Clients of the company, namely, but not limited to: money laundering, finance of terrorism, drug trafficking, human trafficking, corruption, bribery, illegal weapon trafficking, illegal substance trafficking.

The AML policy implemented and used by CryptoFinance OÜ is drawn up with the highest international standards and the requirements of the Estonian financial regulatory organs.

The Present AML policy includes the following parts:

1. Company activities, license and designated compliance officer

1.1 The Company provides services in the field of financial transactions by means of cryptocurrency.

1.2 The Company acts in accordance with the issued license number FIA000071 issued by the Estonian Anti-Money laundering bureau.

1.3 In accordance with the applicable law, the Company appoints responsible persons as the company AML compliance officer, who is obligated to:

- Monitor the correct implementation of the present policies by the company employees;
- Organize the correct implementation of KYC policy;
- Verify the gathered information;
- Ensure the correct use of information and abidance to the company Privacy policy;
- Perform the required risk analysis;
- Inform the state regulators in case the transaction risk is considered too high.

1.4 The compliance officer is entitled to inform the state regulatory organs of any transaction that he may deem suspicious due to the high risk of any such transactions. The information provided by the compliance officer may only be provided to the state regulator member of sufficient authority.

2. The Company KYC procedures

2.1 The Company KYC procedures are implemented in order to identify the Client and verify the information provided by the Client.

2.2 In order to proceed with the Client identity verification procedure the company is entitled to require the Client to provide the necessary information and documentation, including the scanned copy of a valid identity confirmation documents.

2.3 The Compliance officer is entitled to request additional information or documentation should he deem the already provided information insufficient or should he have any doubts regarding its accuracy or validity.

2.4 All the information provided by the Client under the KYC policy may be controlled by the available public databases or by relative inquiries to the state organs or officials depending on the Client state of residence.

2.5 The company is entitled to continue the verification procedures after the initial process was finished and retains the right to ask for the document renewal or for the relevant update of the already provided information.

2.6 All the information collected under the KYC procedures of the present AML policies may only be used in accordance with the applicable legislation regarding the protection of private information and the company relevant privacy policy. All the gathered information must be maintained under proper security measures and may not be disclosed to third Parties unless in accordance with the relevant court order.

3. Transaction monitoring

3.1 All the transactions performed under the Client request are monitored in regards to the compliance with the present AML policy.

3.2 Every transaction performed is made after the proper risk analysis procedure, which includes the involved Parties, nature of the transaction and sum of the transaction.

3.3 The company is entitled to postpone or cancel any transactions should it be deemed a suspicious or high risk.

4. Risk analysis procedures

4.1 Every Client and every transaction requested by the Client is monitored for existing and relevant risks.

4.2 The risk analysis procedures are carried out by the compliance officer.

4.3 The risk analysis procedures are performed in accordance with the existing rules and regulation set by the applicable legislation and the instructions of the state regulatory organs.

4.4 All the transactions that are ordered by the Client must have an appropriate risk level, from low, to moderate and high.

4.5 The company may regularly update the relevant risk analysis procedures to make them more accurate or to adequately evaluate new appearing risk factors.

4.6 Any records regarding high-risk activity must be properly presented to the state authorities for review. Every future action regarding the particular transactions may be made only under the proper instructions of the state officials.

5. Information storage

5.1 any information gathered under the present AML policy is to be maintained for a period of no less than 5 years in a form that allows written reproduction.

5.2 All the employees of the company must have relevant training regarding information gathering and storage.

5.3. Any information that is stored may be submitted to the state regulatory authorities in case of a request on their part or as a result of revealed violations.