

AML/KYC POLICY

General information and definitions:

Activity: Providing a virtual currency service (services of exchanging a virtual currency against a fiat currency, a virtual currency wallet service).

Customer An individual Customer from an age of 18+ or a legal entity that has read and agreed to the Customer Agreement of Company and uses services of the Company provided through the Website Platforms.

Services Services that are being offered by the Company through the Website Platforms.

Account An electronic facility which enables Customer to exchange Funds and make electronic Funds transfers to/ from Customer's

Account held with the Company and that stores information of the Customer and history of his/her transactions.

This Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML/KYC Policy”) is designated to prevent and mitigate risks of Company related to money laundering and associated risks. This is a short extract of key principles of the internal Policy and should not be seen as a complete document. Customer can request details by contacting customer support of the Company.

Domestic and international regulations require Company to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Customers.

This “AML/KYC Policy” is an integral part of the Customer agreement, located at the Company’s Website. Non-compliance with this “AML/KYC Policy” can be a ground for termination of the Customer agreement on Company’s sole discretion.

AML/KYC Policy covers the following matters:

- appointing an Anti-Money Laundering Compliance Officer (AMLCO) and making sure that employees know to report any suspicious activity to him;
- identifying the responsibilities of senior managers and providing them with regular information on money laundering risks;
- training relevant employees on their anti-money laundering responsibilities;
- documenting and updating anti-money laundering policies, controls and procedures;

- introducing measures to make sure that the risk of money laundering is taken into account in the day-to-day running of your business;
- forwarding/reporting all sustained suspicions to the relevant authority;
- promptly responding to all communication from the relevant authority.

Before the Company can execute any transaction for any new Customer, a number of procedures need to be in place and carried out:

- AML procedures, namely identification, record-keeping, discovering and monitoring unusual or suspicious transactions and as appropriate internal reporting and control;
- Employees know their responsibilities and the company's procedures;
- Relevant training is being undertaken;
- All relevant requests from outside sources are forwarded directly to the AMLCO.

Customer's identification information will be collected, stored, shared and protected strictly in accordance with the company's Privacy Policy and related regulations that correspond to the GDPR requirements.

The Company is obliged and has the right without obtaining prior consent to share with financial institutions and law enforcement agencies any information about the Customer, as required by applicable law, and the Customer gives the Company its consent to these actions. In order to comply with this, the Company holds a record about Customer's transactions during five years at least.

The Customer undertakes to follow the legislation, including international one, aiming to combat illicit trafficking, financial fraud, money laundering and legalization of funds obtained by illegal means. The Customer undertakes to use its best effort to avoid direct or indirect participation in illegal financial activities and any illegal transactions using the Company's Website and Services.

The Company has the right to request additional information about the Customer if the method of withdrawal Assets is different from the depositing method. The Company also reserves the right to block the Customer's Account during the

investigation if the Customer refused to provide the additional information requested by the Company.

In the course of investigation, the Company has the right to request additional copies of documents confirming the identity of the Customer, as well as copies of bank cards used to replenish the account, payment documents and other documents confirming the lawful possession and legal origin of funds. The Company also has the right to demand the provision of original documents for review in case of any doubts from Company's side.

The Company's refuse to perform the operations that from Company's point of view are considered to be a suspicious, using of preventive measures (such as blocking or closing of a Customer's Account) is not the reason for civil liability of the Company for failure to fulfill obligations to the Customer.

The Company is not obliged to inform the Customer or other persons about the measures taken to fulfil the AML/CFT legislation. Also the Company is not obliged to inform Customers or other persons about any suspicions, about the reasons of refuse of execution of a Customer's trading order, of refuse to open the Account, need for providing Customer's documents, etc.

AMLCO:

AMLCO is ultimately responsible for implementing the regulations concerning AML. For the sake of ease of navigation in this document 'compliance officer' and 'AMLCO' refer to the same person; however, the specific tasks of each role are different.

As noted above, the AMLCO is a person of authority with access to any and all relevant information for the completion of his duties.

Compliance department is intended to ensure that all the operations of the Company are consistent with the international standards to combat money laundering and all the documents provided by the Customer are up-to-date and comply with relevant legal requirements. By performing the registration on

Company Website Platform the Customer makes complete and unconditional acceptance of the policy conditions, agrees with the following rules and undertakes to observe them:

All Customers are treated in the same manner, therefore the AML (Anti Money Laundering) requirements are the same.

Usually Company try to perform KYC procedures as soon as possible, however in separate circumstances it may take several days.

During registration, as part of the KYC process, the Customer is obliged to submit a number of statements, for example, about his/her employment status, average remuneration, country of employment, purpose of setting up an Account, the expected amount of the Funds and his/her investment experience. In addition, the user is asked about the origin of Funds to be allocated to the Website platform, their legality and whether he/she is a politically exposed person or a person from the inner circle of such a person. All such information helps us learn more about the Customer and make sure that transactions are consistent with our knowledge about the Customer. In each case, Company may ask the Customer to send additional documents both in the case of individual and legal entity Customers. This is always determined by the Company's need to fulfil its statutory duties and should also be treated as a sign of concern for the Customer and protection of his/her significant legal interests.

Risk assessment

The Company shall apply appropriate measures and procedures, by adopting a risk-based approach, so as to focus its effort in those areas where the risk of Money Laundering and Terrorist Financing appears to be comparatively higher.

Further, the AMLCO shall monitor and evaluate, on an on-going basis, the effectiveness of the measures and procedures of this Policy.

The adopted risk-based approach that is followed by the company, and described in the Policy, has the following general characteristics:

- recognizes that the money laundering or terrorist financing threat varies across Customers, countries, services and financial instruments;
- allows the board of directors to differentiate between Customers of the Company in a way that matches the risk of their particular business;
- allows the Board to apply its own approach in the formulation of policies, procedures and controls in response to the Company's particular circumstances and characteristics;
- helps to produce a more cost-effective system;
- promotes the prioritization of effort and actions of the company in response to the likelihood of Money Laundering and Terrorist Financing occurring through the use of the services of the Company.

The risk-based approach adopted by the Company, and described in the Policy, involves specific measures and procedures in assessing the most cost effective and appropriate way to identify and manage the Money Laundering and Terrorist Financing risks faced by the Company.

Transaction monitoring

The constant monitoring of the Customers' accounts and transactions is an imperative element in the effective controlling of the risk of Money Laundering and Terrorist Financing.

In this respect, the AMLCO shall be responsible for maintaining as well as developing the on-going monitoring process of the Company.

Sanctions

The Company is prohibited from transacting with individuals, companies and jurisdictions that are under international sanctions.

Prohibited transactions

The withdrawal of Funds is carried out only to the account that belongs to a person identified as a Customer of the Company. The withdrawal of Funds to third parties is prohibited. Internal transfers between the Company's customers are also forbidden.

Restricted jurisdictions

Company cannot provide its services to the residents of the following countries/territories:

1. Afghanistan
2. Albania
3. American Samoa
4. Angola
5. Anguilla
6. Balkanas
7. Bangladesh
8. Barbados
9. Belarus
10. Benin
11. Bosnia & Herzegovina
12. Botswana
13. Bulgaria
14. Burkina Faso
15. Burundi
16. Cambodia
17. Cameroon
18. Cayman Islands
19. Croatia
20. Central African Republic
21. Chad
22. China
23. Comoros
24. Congo Democratic Republic
25. Cote d'Ivoire
26. Crimea
27. Cuba
28. Democratic People's Republic of Korea (North Korea)
29. Democratic Republic of the Congo
30. Djibouti
31. Dominican Republic
32. Equatorial Guinea
33. Eritrea
34. Ethiopia
35. Fiji
36. Gibraltar
37. Ghana
38. Guam

39. Guatemala
40. Guinea
41. Guinea Bissau
42. Haiti
43. Honduras
44. Hong Kong
45. Iran
46. Iraq
47. Jamaica
48. Jordan
49. Kenya
50. Laos
51. Lebanon
52. Liberia
53. Libya
54. Madagascar
55. Mali
56. Malta
57. Mauritania
58. Mauritius
59. Moldova
60. Mongolia
61. Montenegro
62. Morocco
63. Mozambique
64. Myanmar
65. Nicaragua
66. Nigeria
67. Northern Mariana Islands
68. Pakistan
69. Palau
70. Palestina
71. Panama
72. Papua New Guinea
73. Paraguay
74. Philippines
75. Puerto Rico
76. Republic of the Union of Myanmar (Myanmar)
77. Russia
78. Samoa
79. Serbia
80. Senegal
81. Sevastopol
82. Seychelles
83. Sierra Leone
84. Somalia
85. South Sudan
86. South Africa
87. Sri Lanka
88. Sudan

89. Syria
90. Tanzania
91. The Bahamas
92. Togo
93. Trinidad and Tobago
94. Tunisia
95. Turkiye
96. Turkmenistan
97. United Arab Emirates
98. Uganda
99. Ukraine
100. US Virgin Islands
101. USA
102. Vanuatu
103. Vietnam
104. Venezuela
105. Yemen
106. Zimbabwe