

# **AML Policy**

# Anti-money laundering (hereinafter "AML Policy") Cryptokg is aimed at eliminating and reducing possible risks associated with any type of illegal activity.

In compliance with international rules and laws of Estonia, Cryptokg (hereinafter the "Company") has adopted effective internal processes to prevent money laundering and terrorist financing, processes to prevent drug and human trafficking, the proliferation of weapons, corruption, bribery, actions by its Clients.

AML's policy includes the following aspects:

- Verification processes.
- Monitoring transactions.
- Risk assessment.

# 1. Verification processes

Based on the values of international standards adopted to combat illegal activities, the procedure for checking Clients is one of the main points of international standards. According to this statement, the Company establishes processes for verification of Clients within the framework of the current anti-money laundering standards and the "Know Your Client" policy.

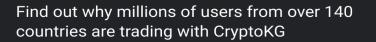
# 1. ID confirmation

The verification process in the Company obliges the Client to provide the Site with authentic documents (including an international passport, account statement, utility bills). In this case, the Company reserves the right to collect the Client's identification data within the framework of the established anti-money laundering policies. Any legal tools will be involved in the identity verification process and the Company reserves the right to verify specific Clients that have raised suspicions.

The procedure for confirming and verifying identity includes the provision of documents that prove the identity of the user:

# For individuals:

1. It is necessary to confirm the identity of the Client by providing one of the following documents:





- Passport of a citizen of the country
- international passport
- ID card
- 2. The Client's address must be confirmed by means of one of the following documents:
  - An extract from the bank, where the address of the actual residence of the Client is clearly visible.
  - Payment for utilities, where the address of the actual residence of the Client is clearly visible.
  - Tax documents, where the address of the actual residence of the Client is clearly visible.
  - A document confirming the place of residence issued by the local authorities, where the address of the actual residence of the Client is clearly visible.

# For corporate clients:

- 1. To confirm the identity, the Client is obliged to provide one of the following documents:
  - Director's civil passport
  - Director's passport
  - Director's ID
- 2. To confirm the address, the Client is obliged to provide one of the following documents:
  - An extract from the bank, where the address of the actual residence of the Client is clearly visible.
  - Payment for utilities, where the address of the actual residence of the Client is clearly visible.
  - Tax documents, where the address of the actual residence of the Client is clearly visible.
  - A document confirming the place of residence issued by the local authorities, where the address of the actual residence of the Client is clearly visible.

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- 3. To confirm that the Client is an authorized representative of the organization, the Client is obliged to provide all relevant documents:
- A document confirming the legal address of the company.
- A document confirming the registration of a legal entity.
- The procedure for appointing a director.
- Scanned copy or photo of a written document about the decision to cooperate with Cryptokg.
- 4. Ultimate beneficiary data:
- Final recipient's civil passport;
- Final consignee's passport;
- Ultimate Beneficiary ID
- A document confirming the final recipient's address.

The ultimate beneficiary is the person who controls or owns the User Account, or the person on whose behalf transactions are made.

- 1. In the case when the beneficiary is a legal entity:
- An individual who owns or controls an organization, direct or indirect ownership, control over a sufficient percentage of shares) 10% +1 share)
- An individual who exercises control over the management of a legal entity.
  - 2. In the case when the beneficiary is a legal entity (fund, trust) that distributes funds and manages:
  - An individual who is the beneficiary of 10% + of the property of a legal entity;
  - Cryptokg reserves the right to identify the Client on an ongoing basis, including cases when the Client's identification information has been changed or the Client's activity seems suspiciously unusual for a particular Client.

The Company also reserves the right to request updated documents from the Clients, even if the verification process was completed earlier. The data collected during verification will be stored, protected and used strictly in accordance with Cryptokg's Privacy Policy and related regulations.

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Upon completion of the verification of the identity of the Client, the Company will be able to relieve itself of possible legal liability in cases where the Company's Services were affected in illegal fraud.

### 1.2 Bank card verification

Customers wishing to use online cards are required to check the card based on the instructions on the website <u>http://cryptokg.com</u>

### 2. Monitoring transactions

Clients are verified not only by the identity verification method, but also by another important method of analyzing the Client's transaction patterns. This helps the Company to rely on information analysis as a tool for assessing Client activity and risk. The company conducts data collection, filtering, recording, reporting and investigation management.

The company has the right to track all transactions and reserves the right to take further actions:

- Requesting additional data, documents from the Client, if suspicious transactions are detected;
- Stopping and blocking the Client's Account if the Company has reasoned suspicions that the Client has committed illegal fraud.

This list is not exhaustive, transactions will be monitored daily to further determine the degree of suspicion of actions with transactions. The client does not get the opportunity to create a voucher using the funds that are credited to the payment card of the online bank. These funds that are credited to such cards can only be spent on cryptocurrency and returned to the same card.

## 3. Risk assessment

The company, in accordance with international requirements, uses a risk-based approach to combating money laundering and terrorist financing. The Company seeks to ensure that measures to prevent money laundering and terrorist financing are taken commensurate with the identified risks. Resources will be allocated in accordance with priorities, emphasizing the greatest risks.

Streaming Policy is provided by Cryptokg in three languages - English, Russian and Polish. The English version is considered predominant in the interpretation of its content. The Russian and Polish version is a literal translation.

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