

ANTI-MONEY LAUNDERING AND KNOW YOUR CUSTOMER POLICY OF COINCASH PAYMENTS LTD.

CoinCash Payments LTD.
Hova House, 1 Hova Villas, Hove, England,
BN3 3DH United Kingdom
Company number 10263693
www.coincash.eu
support@coincash.eu

1. CoinCash AML and KYC Policy

It is the policy of Coincash Payments LTD. to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by applying industry good practices and following the guidelines provided by relevant legislation.

Our AML and KYC policy, procedures and internal controls are designed to ensure prevention of anti-money laundering activities and will be reviewed and updated on a regular basis to ensure appropriate policies, procedures and internal controls are in place to account for both changes in industry practices and changes in our business.

Coincash Payments LTD. will at any time cooperate with competent authorities if it suspects any activity that facilitates money laundering or the funding of terrorist or criminal activities.

Coincash Payments LTD. also reserves the right to refuse to provide services to any User who are subject to financial, commercial or other international sanctions. Coincash Payments LTD. will comply especially (but not exclusively) with the following sanctions lists:

1. The United Nations (UN) Security Council consolidated sanctions list;
2. The EU's consolidated list of persons, groups and entities;
3. The US Department of the Treasury, Office of Foreign Assets Control (OFAC) sanctions lists;
4. The US Department of the Treasury, Financial Crimes Enforcement Network (FinCEN) list;
5. The UK HM Treasury (HMT), Office of Financial Sanctions Implementation, "consolidated list of targets"

Coincash Payments LTD. further reserves the right to refuse to provide services to any USER who is a resident of the following countries qualified as high-risk jurisdictions by the European Commission due to their weak anti-money laundering and terrorist financing regimes:

- (1) Afghanistan,
- (2) American Samoa,
- (3) The Bahamas,

- (4) Botswana,
- (5) Democratic People's Republic of Korea,
- (6) Ethiopia,
- (7) Ghana,
- (8) Guam,
- (9) Iran,
- (10) Iraq,
- (11) Libya,
- (12) Nigeria,
- (13) Pakistan,
- (14) Panama,
- (15) Puerto Rico,
- (16) Samoa,
- (17) Saudi Arabia,
- (18) Sri Lanka,
- (19) Syria,
- (20) Trinidad and Tobago,
- (21) Tunisia,
- (22) US Virgin Islands,
- (23) Yemen.

Coincash Payments LTD. reserves the right to refuse to provide services to anyone who is considered as a risk under its AML and KYC policy, and refuse to process any transaction for such person, and take any other action we deem necessary against such person, including reporting our suspicion to the competent legal authorities.

2. AML Compliance Officer

Coincash Payment LTD. has designated an Anti-Money Laundering Program Compliance Officer (AML Compliance Officer), with full responsibility for the firm's AML program. The duties of the AML Compliance Officer will include monitoring the firm's compliance with AML obligations, overseeing communication and training for employees. The AML Compliance Officer will also ensure that the firm keeps and maintains all the necessary AML records and will ensure that Coincash Payments LTD. cooperates with authorities when appropriate. The AML Compliance Officer is vested with full responsibility and authority to enforce the firm's AML program.

3. Customer Identification

We will collect certain customer identification information from each customer who opens an account and/or uses our services; utilize risk-based measures to verify the identity of each customer who opens an account; record customer identification information and the verification methods and results; and compare customer identification information with government-provided lists.

a. Required Customer Information

Users shall agree to provide us with identification documentation, including but not limited to the high resolution photo or copy of any of the following documents.

Level 1 identification

We will collect the following information for all accounts, if applicable, for any person, entity or organization that is opening a new account:

- (1) your full name;
- (2) a verified e-mail address;
- (3) bank account number, and
- (4) a verified phone number.

Level 2 identification

Further to the information determined in Level 1 requirements, we will collect the following information and documents, if applicable, for any person, entity or organization that is reaching a cumulated value of transactions as set out by the AML and KYC policy:

For individuals:

- (1) government issued identity card bearing the photo of the holder, or passport,
- (2) proof of address (government issued identity card bearing the address of the holder, or utility bill – electricity, gas, water, landline phone, or bank account statement.

For companies:

- (1) government issued identity card bearing the photo of the holder, or passport of the companies' representative,
- (2) proof of address (government issued identity card bearing the address of the holder, or utility bill – electricity, gas, water, landline phone, or bank account statement of the companies' representative,
- (3) certificate of registration of the company issued by the competent national authority certifying the existence of the company.

Level 3 identification

Further to the information determined in Level 1 and 2 requirements, we will collect the following information and documents, if applicable, for any person, entity or organization that is reaching a cumulated value of transactions as set out by the AML and KYC policy:

- (1) politically exposed person statement (as attached under Appendix 1): Individuals who have, or have had, a high political profile, or hold, or have held, public office, can pose a higher money laundering risk to firms as their position may make them vulnerable to corruption. This risk also extends to members of their immediate families and to known close associates. A politically exposed person is defined as “an individual who is or has, at

any time in the preceding year, been entrusted with prominent public functions and an immediate family member, or a known close associate, of such a person". Prominent public functions include:

- heads of state, heads of government, ministers and deputy or assistant ministers
- members of parliament or of similar legislative bodies
- members of the governing bodies of political parties
- members of supreme courts; of constitutional courts or of any judicial body the decisions of which are not subject to further appeal except in exceptional circumstances
- members of courts of auditors or of the boards of central banks.

Politically exposed person status itself does not, of course, incriminate individuals or entities. It does, however, put the User, or the beneficial owner, into a higher risk category, and Coincash Payments LTD, reserves the right to provide services to any User in such status.

(2) ultimate beneficial owner statement (as attached under Appendix 2)

(3) proof of source as determined on a case-by-case basis and in the sole discretion of Coincash Payments LTD.

Levels of identification (value of crypto-fiat exchanges cumulated over a 365-day-long period):

EUR 1 - 1,000: Level 1.

EUR 1,001 – 30,000: Level 2

EUR 30,001 - : Level 3

At the time of reaching the transaction value of Level 3, we will identify any individual that is a beneficial owner of the legal entity customer by identifying any individuals who directly or indirectly own 25% or more of the equity interests of the legal entity customer, and any individual with significant responsibility to control, manage, or direct a legal entity customer. The following information will be collected for each beneficial owner:

- (1) the name;
- (2) place and date of birth;
- (3) an address, and
- (4) an identification number or one or more of the following: a passport number and country of issuance, or other similar identification number, such as an identification card number, or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph.

We reserve the right to require any additional information that maybe considered necessary to comply with our AML and KYC Policy.

Coincash Payments LTD will treat your personal data confidentially and in line with our data privacy policy.

b. Customers Who Refuse to Provide Information

If a potential or existing customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, Coincash Payments LTD. will not open a new account and, after considering the risks involved, consider limiting or closing any existing account. In either case, our AML Compliance Person will be notified so that we can determine necessary action.

c. Verifying Information

Based on the risk, and to the extent reasonable and practicable, we will ensure that we have a reasonable belief that we know the true identity of our customers by using risk-based procedures to verify and document the accuracy of the information we get about our customers. We will analyze the information we obtain to determine whether the information is sufficient to form a reasonable belief that we know the true identity of the customer (*e.g.*, whether the information is logical or contains inconsistencies).

We will verify customer identity through documentary means, non-documentary means or both. We will use documents to verify customer identity when appropriate documents are available. In light of the increased instances of identity fraud, we will supplement the use of documentary evidence by using the non-documentary means whenever necessary. We may also use non-documentary means, if we are still uncertain about whether we know the true identity of the customer.

d. Recordkeeping

We will document our verification, including all identifying information provided by a customer, the methods used and results of verification, and the resolution of any discrepancies identified in the verification process. We will keep records containing a description of any document that we relied on to verify a customer's identity, noting the type of document, any identification number contained in the document, the place of issuance, and if any, the date of issuance and expiration date. With respect to non-documentary verification, we will retain documents that describe the methods and the results of any measures we took to verify the identity of a customer. We will also keep records containing a description of the resolution of each substantive discrepancy discovered when verifying the identifying information obtained. We will retain records of all identification information for five years after the account has been closed; we will retain records made about verification of the customer's identity for five years after the record is made.

4. Internal control

Coincash Payments LTD. has reviewed all areas of its business to identify potential money laundering risks that may not be covered in the procedures described above.

We will develop ongoing employee training under the leadership of the AML Compliance Officer and senior management. Our training will occur on at least an annual basis. It will be based on our firm's size, its customer base, and its resources and be updated as necessary to reflect any new developments in the law. We will review our operations to see if certain

employees, such as those in compliance, margin and corporate security, require specialized additional training.

The testing of our AML program will be performed at least annually (on a calendar year basis) by the AML Compliance Officer and/or an independent third party. Independent testing will be performed more frequently if circumstances warrant.

After we have completed the independent testing, staff will report its findings to senior management. We will promptly address each of the resulting recommendations and keep a record of how each noted deficiency was resolved.

We will subject employee accounts to the same AML procedures as customer accounts, under the supervision of the AML Compliance Officer. We will also review the AML performance of supervisors, as part of their annual performance review.

Employees will promptly report any potential violations of the firm's AML compliance program to the AML Compliance Officer. Such reports will be confidential, and the employee will suffer no retaliation for making them.

5. Closing Provisions

Coincash Payments LTD. reserves the right to amend the present AML Policy at its sole discretion at any time.

Senior management has approved this AML and KYC compliance program in writing as reasonably designed to achieve and monitor our firm's ongoing program to combat money laundering activities and finance of terrorism through our services.

6 August 2019

CoinCash Payments Ltd.