



ANTI-MONEY LAUNDERING EXTERNAL POLICY

July 2022

1. SCOPE

- 1.1. The ICONOMI Anti-Money Laundering (“AML”) Policy for the ICONOMI Platform, which includes products and services available at www.iconomi.com (“Platform”), is designed to prevent money laundering by setting up adequate systems and controls to mitigate the risk of the platform being used to facilitate financial crime.
- 1.2. The AML policy is a set of internal rules and regulations that is used by the Company in order to check and reveal documentation and information regarding its operation that is under obligatory control, and other operations with money or property that may be in any way connected to money legalisation (money laundering) or finance of terrorism, and the provision of such information to the state authorities.
- 1.3. Unless otherwise determined hereunder, all capitalized terms herein shall have the same meaning as ascribed to them in the General Terms and Conditions for Iconomi End Users, as amended from time to time.
- 1.4. This AML Policy is produced in accordance with the applicable laws and regulations of England and Wales & The European Economic Area.

2. SYSTEMS AND CONTROLS

- 2.1. The systems and controls mentioned in article 1.1. are as follows:
 - (a) Ascertainment of customer identity is the first stage in the Anti-Money Laundering procedure. Client screening and monitoring depend on the classification of the client and statutory requirements and go from the usual client screening to in-depth due diligence.
 - (b) All deposits to and withdrawals from the Platform are duly monitored. In case users meet the conditions that are stated in the General Terms and Conditions for Iconomi End Users, the users can bring fiat or certain cryptocurrencies to or from the Platform. We do not assume any liability for the origin of currencies being deposited on the platform.

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- (c) Any unusual activity that results in suspicion of money laundering is scrutinized in-house by the AML team/department.
- (d) Whenever there is suspicion about intended money laundering, all the measures in line with ICONOMI's AML Policies and Procedures are carried out to block activity on the relevant user account.
- (e) All transaction data and information obtained for the purpose of identification and transactions are stored for no less than 10 years.

3. MINIMUM STANDARDS AND MEASURES

3.1. This AML policy sets out the minimum standards that must be complied with and includes a comprehensive set of measures for detecting and preventing money laundering activities, such as:

- (a) Tracking the IP addresses of users and geo-locating users to prevent users from accessing ICONOMI's service in Prohibited Areas.
- (b) All user actions on the Platform are tracked, including all their transactions, such as funding their user accounts, withdrawing from their user accounts, and buying single Crypto assets or Crypto Strategies.
- (c) Most control of the user accounts is gained through ICONOMI's verification process, carried out by ICONOMI or by an established and trusted vendor, during which certain verification thresholds are put in place in order for users to gain access to different verification tiers. All documents provided must either be in the English language or in a certified translation into English and must be in Latin script. ICONOMI reserves the right to allow certain other languages for verification documents and also reserves the right to demand a certified translation of such documents.

3.2. You can find a transparent and detailed list of personal data that ICONOMI collects together with the basis for collecting and processing it in the ICONOMI Privacy Policy (Personal Data Collected).

3.3. The withdrawal and deposit limits published on ICONOMI's Website are calculated in the default currency of the platform (EUR) based on the following principles (but may be shown in the users selected default currency):

- (a) deposited or withdrawn amounts in the form of digital assets are calculated based on the exchange rate at the time of the deposit or withdrawal,
- (b) deposited or withdrawn amounts in the form of EUR are calculated based on the average monthly exchange rate,

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- (c) ICONOMI does not allow 3rd party deposits and withdrawals
- 3.4. ICONOMI is prohibited from transacting with individuals, companies, and countries that are on prescribed Sanctions lists. ICONOMI will therefore screen against the United Nations, European Union, UK Treasury, and US Office of Foreign Assets Control (OFAC) sanction lists in all jurisdictions in which ICONOMI operates and will adjust its policies and procedures accordingly.
- 3.5. No matter which tier a user is verified to, ICONOMI reserves all rights and has full discretion to block or freeze user accounts without prior notice and/or request additional documents and information about the user or their transactions. This may be done in cases related to, among other reasons, (i) user or transaction associated with one or more high-risk countries, (ii) politically exposed persons or users or transactions associated with UK or other member states of European Economic Area or high risk countries, (iii) other cases in which the risk of money laundering or terrorist financing is considered high or cases where the transaction may be considered high risk.
- 3.6. ICONOMI uses a software solution with which it performs checks of transactions of the deposited cryptocurrencies and tokens (assets). If a part or entire deposited assets are found to be stolen or flagged as part of any other past criminal activities by the aforementioned software, ICONOMI will return/or freeze the deposit in question and also reserves the right to block or freeze the user account. We also reserve the right to inform the competent authorities about such activities.
- 3.7. ICONOMI reserves the right to assess, review and check the authenticity of the documents provided by the user and the correctness of the provided information in all possible ways.

ICONOMI reserves the right to ask the user for, among others, information and documents as well as the source of funds in relation to a transaction, customer, funds, or assets, regardless of the value of the transaction. After checking and assessing the provided documents and information.

ICONOMI reserves the right to ask the user for additional documents and information if it regards the provided documents and information as insufficient, incorrect, or inadequate in any way.

4. COMPANY EMPLOYEES TRAINING

- 4.1. The program regarding the training of employees in the field of Anti Money Laundering Legislation and Prevention of the finance of terrorism is made in accordance to the applicable legislation and includes proper instructions for the employee regarding the control methods

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and information analysis. Any employee must be properly instructed by the authorised workers during the period of a month from the start of employment.

5. INTERNAL CONTROL REVIEW

- 5.1. The internal control review program ensures that the employees and members of the company abide by the provisions of the applicable legislation in the field of income legalisation obtained by illegal means and the finance of terrorism. The program ensures that the employees abide by internal company rules and regulations in the field of internal control.

6. DOCUMENT MAINTENANCE

- 6.1. All documents connected to the Client identification procedure as well as all the information regarding the start of commercial cooperation must be maintained in the company archive for no less than 5 years.
- 6.2. All documents that became the reason for notifying the state authorities must be maintained for no less than 5 years.