

Exchange IT Online OÜ

AML Policy

1. OBJECTIVE OF THE AML POLICY

Exchange IT Online OÜ ("We", "our") is under the obligation to apply anti-money laundering (AML) requirements in our business. All our staff is committed to pursue the highest standards of AML and Know Your Customer (KYC) compliance to mitigate the risk of our services being used to facilitate financial crimes.

We have implemented the framework of AML Policy in order to ensure that all the necessary steps are taken to achieve the full safety of our services. In this AML Policy we are committed to follow the provisions specified in the Estonian AML laws, EU and international AML guidelines.

2. WHAT IS AML POLICY?

AML Policy is the procedure to prevent our services from being used for the purposes of money laundering, terrorist financing or any other criminal activity. KYC measures are part of the AML Policy. The objective of KYC measures is to enable businesses to know and understand their customers better and help them manage their risks. We may update such procedure in the future to assure the compliance with the existing laws and best AML practice.

In case of any potentially suspicious or unusual transactions or customer's behavior we undertake appropriate measures to address the risks occurred. All staff handling transactions may ask for additional documents such as proof of source of fund etc. as deemed appropriate.

We keep a well-organized procedure of maintaining all records including customer's identification documents and related data. All customer and transactional information is stored confidentially and according to personal data protection laws.

Our AML Policy includes:

- - Identification and verification of the customer before entering a financial business relationship.
- - Establishment and maintenance of the risk-based customer due diligence including enhanced due diligence for those customers presenting higher risks.
- - Transactions monitoring of the customer financial behavior based on risk-based analysis.
- - Procedures for reporting suspicious activity internally and to the relevant law enforcement authorities.
- - Periodical AML trainings for our staff.

We are obligated to reject the customer's documents, close account and terminate the business relationship if we find any suspicious activity, false documents or non-cooperation by the customer within the customer due diligence process.