#### **ANTI-MONEY LAUNDERING**

#### AND

#### **KNOW-YOUR-CUSTOMER POLICY**

#### Last updated on October 02, 2024

### LEGAL INFORMATION

https://vivexcoin.io/ ("Site", "Platform") is operated by VIVEXCOIN SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (LLC), registered under the laws of Poland with the National Court registration number 0001006127, registered address at 53/57 Chadakowska street, office 22A, Warsaw, 03-816, Poland and with registration number in the Register of Virtual Currencies - RDWW-565 ("Company", "Vivexcoin", "we," "us," or "our").

### INTRODUCTION

Our company, as an obliged institution, is committed to preventing money laundering and terrorist financing, and to ensuring compliance with all applicable anti-money laundering/counter financing of terrorism ("AML/CFT") laws and regulations. To that extent, we have established this Anti-Money Laundering and Know Your Customer Policy ("AML/KYC Policy").

This AML/KYC Policy applies to all Vivexcoin Clients. By creating an account on our Site, the Client accepts the Company's AML Policy and agrees to abide by its AML and KYC procedures.

PLEASE READ THIS AML/KYC POLICY CAREFULLY.

#### AML MEASURES

Our AML Policy includes the following measures:

- 1) Customer Identification and Verification: we have procedures in place to verify the identity of our customers, including the collection and verification of personal information such as name, address, and government-issued ID.
- 2) Risk Assessment: we conduct ongoing risk assessments to identify and assess any potential money laundering or terrorist financing risks associated with customers, services, and geographic locations.
- 3) Suspicious Activity Reporting: we have procedures in place for the reporting of suspicious activity to the appropriate authorities.
- 4) Record Keeping: we maintain accurate and complete records of all transactions and customer identification information in accordance with applicable laws and regulations.
- 5) Employee Training: All employees are trained on our AML policies and procedures and applicable laws and regulations.
- 6) Reporting: we have an internal system for reporting to regulatory authorities as required by law.

7) Compliance Officer: we have a designated compliance officer responsible for monitoring compliance with AML regulations and implementing the Platform's AML policies and procedures.

# **KNOW YOUR CUSTOMER (KYC)**

Know Your Customer (KYC) procedures allow us to verify the identity of every Client and assess any potential risks for illegal activities such as money laundering or financing terrorism. This is done by collecting and verifying personal information, such as a government-issued ID and proof of address. We also monitor transactions for unusual or suspicious activity.

We have implemented procedures to verify the identity of our Clients prior to conducting any business transactions. These procedures include, but are not limited to, the collection and verification of the following information and documentation:

- 1) Full name
- 2) Date of birth
- 3) Nationality
- 4) Telephone number and email
- 5) Address
- 6) Government-issued ID, such as a passport or national ID card
- 7) Proof of address, such as a utility bill or bank statement
- 8) Additional documentation may be required for high-risk clients

We have implemented procedures to screen Clients against government-sanctioned lists and Politically Exposed Persons (PEP) lists. These procedures include, but are not limited to, the following:

- 1) Initial screening at the time of account opening or onboarding of a new client
- 2) Periodic re-screening of existing clients in accordance with regulatory requirements and internal policies
- 3) Utilizing a reliable and up-to-date screening database or service provider

We have also implemented procedures to verify and monitor the transactions of our Clients in order to detect and prevent fraudulent or illegal activities. These procedures include, but are not limited to, the following:

- 1) Verifying the identity of the cardholder or account holder prior to processing transactions
- 2) Utilizing measures to authenticate transactions, such as CVV, OTP, and biometric verification
- 3) Monitoring transactions for unusual or suspicious activity, such as large or frequent transactions
- 4) Implementing transaction limits and flagging or declining transactions that exceed these limits
- 5) Retaining transaction records in accordance with regulatory requirements and internal policies

#### **COMPLIANCE OFFICER**

We have appointed AML officer who is responsible for ensuring that the company's AML

policies and procedures are implemented and followed effectively.

The Compliance Officer oversees the company's compliance with AML laws and regulations; develops, implements and updates the company's AML policies and procedures; provides training and guidance to employees on AML compliance; regularly assesses and reports on the company's AML compliance program; investigates and reports suspicious activities to the appropriate authorities.

### **TERMINATION OF SERVICES**

We have the right to terminate our business relationship with any Client who is found to be in violation of the company's AML policy or any applicable laws and regulations. This includes, but is not limited to, the following circumstances:

- 1) Failure to comply with the company's KYC procedures and provide the required documentation
- 2) Providing false or misleading information during the KYC process
- 3) Engaging in suspicious or illegal activities, such as money laundering or financing of terrorism
- 4) Refusing to cooperate with the company's AML investigations or reporting requirements

## CONFIDENTIALITY

Vivexcoin maintains the confidentiality of all Client information and records, as well as information related to suspicious activities, in accordance with our Privacy Policy and applicable laws and regulations.

# **CONTACT US**

For more information on this AML & KYC Policy, please contact us at <u>general@vivexcoin.io</u>.