

## AML/KYC POLICY

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### **Introduction**

Apatris inc. OÜ Anti-Money Laundering and Know Your Customer Policy (hereinafter - the "AML/KYC Policy") is designated to prevent and mitigate possible risks of Apatris inc. OÜ being involved in any kind of illegal activity.

Both international and local regulations require Apatris inc. OÜ to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, a proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Users.

AML/KYC Policy covers the following matters:

1. Verification procedures.
2. Compliance Officer.
3. Monitoring Transactions.
4. Risk Assessment.

### **1. Verification procedures**

One of the international standards for preventing illegal activity is customer due diligence. According to which, Apatris inc. OÜ enjoys certified third-party service for verification procedures within the standards of anti-money laundering and "Know Your Customer" frameworks.

#### **Identity verification**

Apatris inc. OÜ identity verification procedure requires the User to provide the third party compliance service with reliable, independent

source documents, data or information (e.g., national ID, international passport, bank statement, utility bill, source of funds proof etc.). Apatris inc. OÜ itself does not collect User's identification information for the AML/KYC Policy purposes.

Certified third-party compliance service is in charge of the authenticity of documents and information provided by the Users.

User's identification information is NOT collected, stored or shared in accordance with the Apatris inc. OÜ Privacy Policy and related regulations.

Apatris inc. OÜ only collects, stores and thus protects in accordance with Apatris inc. OÜ Privacy Policy the information provided by the users directly to the Apatris inc. OÜ.

Once the User's identity has been verified and thus reported to Apatris inc. OÜ by the third party, Apatris inc. OÜ is able to remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity.

## **2. Compliance Officer**

The Compliance Officer's duties are entitled to the authorized compliance agency.

Inner Compliance Officer of the company is in charge of communication with the authorized compliance agency and in charge of taking any reasonable actions to prevent fraudulent activities.

## **3. Monitoring Transactions**

Apatris inc. OÜ inner procedures require to monitor users activity on a daily basis. Such practices are exploited to analyze patterns and normal activity of the user. Therefore, Apatris inc. OÜ relies on data analysis as a risk-assessment and suspicion detection tool.

Any suspicious activity of the User is being flagged and precisely reviewed. If any User performs transactions of a large volume and/or with a great frequency it may be the reason for extra documents inquiry or additional review by qualified agency or inner compliance personnel.

According to the inner policies of Apatris inc. there is a threshold of monthly transactions by every single User after reaching it the User may be asked for additional documents.

#### **4. Risk Assessment**

Apatris inc. in line with the international requirements has adopted a risk-based approach to combating money laundering and terrorist financing. By adopting a risk-based approach, Apatris inc. is able to ensure that measures to prevent or mitigate money laundering and terrorist financing are commensurate with the identified risks.

Apatris inc. adopts the approach to assess every customer automatically and if necessary with the help of risk manager. Risk Manager duty is to prevent possible fraud from Users, thus customers activity is monitored and evaluated in accordance with the internal risk policies of Apatris inc.

Risk manager assessing the Customers actions is in charge of monitoring (but not limited to):

- Wallet replenishment amounts
- Wallet withdrawal amounts
- Frequency of replenishment and withdrawal
- Biases to particular assets usage
- Withdrawal and replenishment destination accounts