

KYC POLICY

(Valid from June 23, 2022)

Having regard for the safety of the users and due to the legal requirements of The European Union, Financial Action Task Force and others, Vertamon Sp.zo.o has implemented and started to use KYC policy (customer's identification), AML / CTF (combating money laundering and terrorist financing) as it is required from banks and other financial institutions.

The purpose of those policies is an effective combating of money-laundering and terrorist financing (AML / CTF) on our exchange by proper identification of actual users of our accounts and supervision of their transactions. We shall identify and cease transactions made not only to purchase / sell cryptocurrency, but made mainly to hide criminal origin of money, finance illegal activity or other unlawful behaviors.

Specific provisions of our policies are confidential and for internal use only, in order to prevent their avoidance by dishonest or fraudulent users. We would like to introduce to you some of general rules and stipulations of our policies which directly concern you and affect our services we render.

KYC LEVELS

According to the new regulations and guideline on the best practice of KYC system Vertamon Sp.zo.o has established four levels of KYC process for strong privacy and AML policy and for immediate precluding of illicit/unlawful act of third parties, that is the most flexible and appropriate way of saving time and being protected. In order to do so Vertamon Sp.zo.o implemented "Customer Identification Program" that is integrated into the AML (Anti Money Laundering) program for the company in terms of the Prevention of Money Laundering Act.

In order to follow up above mentioned process Vertamon Sp.zo.o requires to obtain sufficient information necessary to establish, to its satisfaction, the identity of each user and the purpose of the intended nature of business relationship. Vertamon Sp.zo.o also might perform appropriate, specific and where necessary, Enhanced Due Diligence on its users that is reasonably designed to know and verify the true identity of its users and to detect and report instances of criminal activity, including money laundering or terrorist financing.

The procedures, documentation, types of information obtained and levels of KYC due diligence to be performed will be based on the level of risk associated with the relationship (products, services, business processes, geographic locations) between the Company and the customer and the risk profile of the customer.

For further usage please note, that already mentioned **four levels of KYC required for credit card transactions** state as follow:

Levels:	Level 1	Level 2	Level 3	Level 4
Documents:	First name, last name	Level 1 docs + ID (Passport, driving license, ID card, residence permit, if required-source of funds (SOF))	Level 1 and 2 docs + selfie , web camera photo	All level docs + proof of residence
Sum limits:	0	Up to 2500 USD	From 2500- to 30000 USD	30000 USD and more

Furthermore, **KYC levels and requested documents for wire transactions** include below mentioned process as well, that states as follow:

Levels	Level 1	Level 2	Level 3	Level 4
Documents:	ID, proof of residence, source of fund (SOF), selfie and PEPs and Sanctions	ID, proof of residence, source of fund (SOF), selfie and PEPs and Sanctions	ID, proof of residence, source of fund (SOF), selfie and PEPs and Sanctions	ID, proof of residence, source of fund (SOF), selfie and PEPs and Sanctions
Sum limits:	0	Up to 2500 USD	From 2500- to 30000 USD	30000 USD and more

Please, note that Vertamon Sp.zo.o with its fruitful collaboration with international provider "SUMSUB" is providing enhanced checks of customers of all levels and uses PEPs, watch list checks and sanctions on all levels of KYC.

USER'S IDENTIFICATION AND VERIFICATION

For further use please, be aware that user identification means identifying the user and verifying his / her identity by using reliable and independent source of documents, data or information to ensure that the user is not a fictitious/ anonymous person/entity. This kind of document could be: relevant personal data, including ID card, bank card, valid photo of you, driving license, selfie or any other document mentioned above.

Vertamon Sp.zo.o with its "Customer identification Program" identifies and verifies each user in different ways, mostly through documents. Rely on risk-based procedures designed by company, Vertamon Sp.zo.o shell verify user and form the reasonable belief that is knows the true identity of its user. To follow up this process verification might include mail, phone, any identity document verification, including tax bills, utility bills, voter rolls and others. Moreover Vertamon Sp.zo.o has

implemented “liveness checks and face match” also, “known face search” program for strong protection and privacy policy.

Regarding above mention please, note that if Vertamon Sp.zo.o cannot determine, beyond a reasonable doubt, that the documents you provided belong to you and are the authentic it won't be able to let you to execute any transactions.

ADDITIONAL VERIFICATION

According to given information referred to users' verification Vertamon Sp.zo.o warns you, that beside general verification process user might be subject to additional verification, that would reflect on verification time period and its final state.

Please, be in conscious that while rise of trade volume or any other suspicious act of you, our AML / CTF verification duties increase as well. The same happens when your transactions are “flagged” as suspicious or unusual, or our verification of your person results in qualifying you as a person imposing significant AML / CTF risk.

In such a cases users are required to provide additional documentation including, exact place of residence, education, occupation, as well as the source of funds (SOF) you are using on the exchange and others.

Note that, if our AML specialists decide information received from you don't clarify our doubts, Vertamon Sp.zo.o will be obliged to end cooperation with you or even report your transactions to relevant authorities.

TRANSACTIONS' MONITORING AND SUPERVISION

Vertamon Sp.zo.o has nonstop ON-GOING document and AML monitoring software, which allows to control and supervise all transaction all time. Ongoing monitoring is an essential element of effective KYC procedures. Vertamon Sp.zo.o can effectively control and reduce the risk as it has an understanding of the normal and reasonable activity of the customer. However, company pays special attention to all complex, unusually large transactions and all unusual patterns which have no apparent economic or visible legitimate purpose, while High-risk accounts are subjected to intensified monitoring.

Vertamon Sp.zo.o puts in place an appropriate software application / mechanism that throws alerts when the transactions are inconsistent with risk categorization and updated profile of customers. Such selected transactions are analyzed by our AML specialists and evaluated if they do not provide significant AML / CTF risks or if they needed to be ceased and clarified with the User.

ON-GOING DOCUMENT monitoring-in this process company ensures user on daily re-check of validity of documents previously submitted, based on their expiry date.

ON-GOING AML monitoring- in this process company ensures user on daily re-check of the users' database against AML watch list.

In order to maintain strict AML/KYC policy of the company, enhance transaction monitoring and meet new challenges, Vertamo Sp.zo. o cooperates with competent financial institutions in order to proceed safe wire transaction. For this reason, mentioned financial institutions are entitled to require source of funds (SOF) from every user that intend to refer wire transaction in amount of 1000 euros or more.

Please note, that above mentioned request on SOF is established on financial institution's internal AML/KYC rules as long with Vertamon Sp.zo. o. AML/KYC policy.

BASIC AML / CTF RULES

In order to fulfil all undertake obligations and maintain KYC policy in shape, Vertamon Sp.zo.o has established along with KYC policy the main and major AML rules for users in order prevent any ambiguous situation in future.

Vertamon Sp.zo.o operating rules include inter alia as follows:

1. Vertamon Sp.zo.o does not accept cash deposits or cash withdrawals in any cases.
2. Vertamon Sp.zo.o does not accept any third parties' deposits on user's account, managing the account on behalf of somebody, joint or shared accounts, etc.
3. Vertamon Sp.zo.o does not allow any exceptions in the field of documentation required from users.
4. Vertamon Sp.zo.o reserves the right to refuse to process the User's transaction at any time, in case of suspicion of AML / CTF risk.
5. In accordance with the international law we are not obliged (or even forbidden) to inform our clients, if we report their behaviors as suspicious to relevant authorities.

SANCTIONED COUNTRIES

In accordance with our policies we do not open accounts and do not process transactions for citizens and residents of, as well as people staying in, countries where transactions are prohibited by international sanctions or their internal law regulations, or countries which based on various criteria selected by our AML team (for example Corruption Perceptions Index by Transparency International, FATF warnings, countries with weak anti-money laundering and terrorist financing regimes determined by European Commission) impose high AML / CTF high risk.

Currently these countries are: Afghanistan, Angola, Azerbaijan, Bahamas, Botswana, Burundi, Cambodia, Cameroon, Central African Republic, Chad, Congo, Cuba, Democratic Republic of Congo, Equatorial Guinea, Eritrea, Ethiopia, Ghana, Guinea Bissau, Haiti, Iran, Iraq, Libya, Madagascar,

Mozambique, Burma, Nicaragua, North Korea, Pakistan, Panama, Rwanda, Sierra Leone, Somalia, South Sudan, USA (some states), Sri Lanka, Sudan, Syria, Tajikistan, Trinidad and Tobago, Tunisia, Turkmenistan, Uzbekistan, Venezuela, Yemen, Zimbabwe, American Samoa, Guam, Nigeria, Puerto Rico, Samoa, Saudi Arabia, US Virgin Islands.