

## **Anti-money laundering and know your customer policy (AML&KYC)**

In order to protect Assets of our customers and to ensure the compliance with international trade standards we operate exclusively in accordance with the legislation on combating illicit money laundering and countering the terrorism financing. To monitor the accordance with legal requirements and recommendations of FATF, we have established a Compliance department developing Anti-money laundering and Know your customer (AML / KYC) procedures, obligatory for all employees and determining the policy of engagement with any person which have registered on the website [www.sentient.exchange](http://www.sentient.exchange). Compliance Department is intended to ensure that all the operations of the Company are consistent with the international standards to combat money laundering and all the documents provided by the Customer are up-to-date and comply with relevant legal requirements. By performing the registration on our Website the Customer makes complete and unconditional acceptance of the policy conditions, agrees with the following rules and undertakes to observe them:

1. All clients of SENTIENT Exchange are treated in the same manner, therefore the AML (Anti Money Laundering) requirements are the same. The only difference may be levels (Tiers) for requesting additional information from clients trading only crypto and from clients trading both, crypto and fiat. The specific requirements and applied limits are specified in Appendix 1 to this AML&KYC policy;
2. If you successfully pass the KYC which is associated with relevant tier, you will obtain all benefits foreseen for this Tier. Usually we try to perform KYC procedures as soon as possible, however in separate circumstances it may take several days;
3. Corporate and institutional customers are recognized as customers with Tier 3 from the beginning, however they are subject for enhanced KYC measures from the beginning. If you are corporate or institutional customer, please follow the requirements of Appendix 2 to this AML&KYC policy;
4. Upon the request of the Company the additional documents and information should be provided by the Customer. Filling of respective KYC questionnaire may also be an obligatory requirement under Company's sole decision. The Customer agrees with such requirements of the Company and agrees to follow them;
5. The withdrawal of Assets is carried out only to the account that belongs to a person identified as a Customer of the Company (the owner of a Trading Room). The withdrawal of Assets to third parties is prohibited. Internal transfers between the Company's customers are also forbidden.
6. The Company is obliged and has the right without obtaining prior consent to share with financial institutions and law enforcement agencies any information about the Customer, as required by applicable law, and the Customer gives the Company its consent to these actions. In order to comply with this paragraph, the Company holds a records about Customer's transactions during five years at least.
7. The Customer undertakes to follow the legislation, including international one, aiming to combat illicit trafficking, financial fraud, money laundering and legalization of funds obtained by illegal means. The Customer undertakes to use its best effort to avoid direct or indirect participation in illegal financial activities and any illegal transactions using the Company's Website and Services.
8. The Customer guarantees the legal origin, legal ownership and the right to use the Assets transferred to its account.
9. In case of the evidence of suspicious transactions at the Customer's account, cash replenishments from untrusted sources (for example, the data of Assets' sender and Trading Room's owner is different) and / or any actions with attributes of fraud (including any refunds or cancellation of payments), the Company

reserves the right to conduct an internal investigation, to block or close the Customer's Trading Room or any Account, cancel any payment or trading order and to suspend operations on the Accounts before the end of the official investigation. When making the decision the Company is guided by the provisions of the applicable law, FATF recommendations or by common practice.

10. The Company has the right to request additional information about the Customer if the method of withdrawal Assets is different from the depositing method. The Company also reserves the right to block the Customer's Trading Room or any Account during the investigation if the Customer refused to provide the additional information requested by the Company.
11. In the course of investigation the Company has the right to request additional copies of documents confirming the identity of the Customer, as well as copies of bank cards used to replenish the account, payment documents and other documents confirming the lawful possession and legal origin of funds. The Company also has the right to demand the provision of original documents for review in case of any doubts from Company's side.
12. The Company does not provide Services to the persons who are residents of jurisdictions that are identified by the FATF as high risk and non-cooperative jurisdictions having strategic AML/CFT deficiencies, namely North Korea and Iran;
13. The Company doesn't provide services to citizens and residents of U.S.A.;
14. The Company's refuse to perform the operations that from Company's point of view are considered to be a suspicious, using of preventive measures (such as blocking or closing of a Customer's Trading Room or any Account) is not the reason for civil liability of the Company for failure to fulfill obligations to the Customer.
15. The Company is not obliged to inform the Customer or other persons about the measures taken to fulfill the AML/CFT legislation. Also the Company is not obliged to inform Customers or other persons about any suspicions, about the reasons of refuse of execution of a Customer's trading order, of refuse to open the Account, need for providing Customer's documents, etc.
16. This anti-money laundering and know your customer policy is an integral part of the Customer agreement, located at the Website. Non-compliance with this policy can be a ground for termination of the Customer agreement on Company's sole discretion.

Appendix 1

**Verification measures for individuals and withdrawal limits corresponding to verification levels;**

<b>Ability</b>	<b>No verification</b>	<b>Verification Level 1</b>	<b>Verification Level 2</b>	<b>Verification Level 3 (corporate customers only)</b>
Deposit	X	Crypto - no limits Fiat - not available	Crypto - no limits Fiat - no limits	Crypto - no limits Fiat - no limits
Withdrawal Automatical Crypto (daily limit)	X	\$100,000.00	\$100,000.00	\$300,000.00
Withdrawal Fiat (daily limit)	X	Not available		
Withdrawal Automatical Crypto (monthly limit)	X	No limits	No limits	No limits
Withdrawal Fiat (monthly limit)	X	Not available	\$500,000.00	\$3,000,000.00
Conditions	Deposit/withdrawal is not available and trading is not available. You can only review the exchange.	Deposit/withdrawal only in crypto and trading available for all instruments	Deposit/withdrawal are available in crypto/fiat and trading available for all instruments	For corporate clients only Level 3 is available.
KYC measures	Verification of E-mail	ID document + video verification + verification of mobile number	Proof of address (not older than 3 months from the date of issuance) + additional proof of identification document + clients should declare basic financial information. Proof of source of funds and any additional document may be requested.	Not available for customers- individuals

## Appendix 2

### **Verification measures for corporate and institutional customers**

This policy is applied for the corporate and institutional Customers only. For this category of Customers, we allow to apply tier 3 from the beginning, but they have to go through the obligatory enhanced verification process.

We reserve the right to refuse You in provision of services if during the process of verification, it is discovered that You do not correspond with our KYC requirements. Also we have a right to terminate our existing relationships with You in any time in case if You are considered to be violating our KYC requirements.

Upon our request any additional documents and information should be provided by You, and if You refuse to provide such documents or information this also may lead to our refuse or termination of provision of services.

To open a Trading Room as a corporate or institutional Customer, please follow the link on website and fill the expanded questionnaire. Please be advised that you should have necessary powers from your company in order to fill the questionnaire. Also please upload listed below corporate documents in Your Trading Room profile. Then You should wait for the following instructions from the manager.

#### **The following supporting documentation must accompany the Customer's completed questionnaire:**

- Memorandum and Articles of Association;
- Certificate of Incorporation;
- Certificate of Incumbency (dated within the last 3 months);
- Financial statements for the last two years, or company bank statements for the last three months;
- Copy of Register of Shareholders;
- Copy of Register of Directors;
- Proof of Registered Address (original utility bill or bank statement displaying the company's name and registered address dated within the last three months);
- Proof of Operating Address (original utility bill or bank statement displaying the company's name and operating address dated within the last three months);
- Individual verification of Authorized Representative (copy of passport verified by notary);
- Individual verification of all active Directors (copy of passport verified by notary and residential utility bill not older than 3 months);
- Individual verification of Shareholders/Beneficial Owners with a holding of 25% or more: - Individual shareholders (copy of passport verified by notary and residential utility bill not older than 3 months); - Corporate shareholders (a complete list of supporting documentation for each company as listed above);
- Confirmation of source of funds. For corporate clients audited bank accounts is a priority;

(example of questionnaire on the next page)

## QUESTIONNAIRE

### for opening of account for corporate and institutional customers

Company Details	
Full Registered company name:	
Other trading names (if applicable):	
Registered company number:	
Company Website Address:	
Please detail your main business activities including your revenue sources:	
Reason for opening the account:	

Registered Company Address	
Address Line 1:	Town:
Address Line 2:	County:
Address Line 3:	Post code:
Country:	Business tel. no:

Operating Address (if different to your Registered Address)	
Address Line 1:	Town:
Address Line 2:	County:
Address Line 3:	Post code:
Country:	Business tel. no:

More Information on The Company	
<b>Is the company authorized and regulated by a financial regulator (e.g. FCA in the UK) in any country or territory?</b>	
If yes please provide details:	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Is the company listed on a Regulated Stock Exchange (e.g. London Stock Exchange in the UK) in any country or territory?</b>	
If yes please provide details:	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Does the company have any pending litigation, disputed accounts or other unresolved matters in any country or territory?</b>	
If yes please provide details:	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Has the company ever been subject to Bankruptcy/Insolvency proceedings in any country or territory?</b>	
If yes please provide details:	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Do you have financial statements that are less than 12 months old?</b>	
If yes please provide the most recent audited and/or unaudited financial statements If no please detail why:	Yes <input type="checkbox"/> No <input type="checkbox"/>

Company bank account information	
Bank Name:	
Accountholder Name:	
Account Number:	
IBAN:	

Sort Code (if any):	
Swift/BIC Code:	
Bank Address:	
Bank contact E-Mail:	
Corresponding bank:	

Approx. amount of company funds (fiat) that will be deposited with SENTIENT Exchange:	
Approx. amount of company cryptocurrency that will be deposited with SENTIENT Exchange:	
Total value of cryptocurrency held:	
The source(s) of fiat and cryptocurrency for trading the account(s) at SENTIENT Exchange (please specify and provide value of funds):	
Are the funds to be deposited entirely from the entity and/or its shareholders/principals? If yes, you declare that all funds to be deposited with SENTIENT Exchange are corporate proprietary funds, resulting exclusively from: a. Paid in capital from the entity's shareholders/principals and/or b. Business profit and/or retained earnings from regular business operations	Yes <input type="checkbox"/> No <input type="checkbox"/>

Representatives, who are authorized to manage your Traders Room and Accounts	
First Name:	Residential Address: _____ _____ _____
Surname:	
Date of Birth:	
Nationality:	
Contact Tel. No.:	Postcode/Zip Code:
Email Address:	Country:
Position within the Company:	
Specimen Signature:	
First Name:	Residential Address: _____ _____ _____
Surname:	
Date of Birth:	
Nationality:	
Contact Tel. No.:	Postcode/Zip Code:
Email Address:	Country:
Position within the Company:	
Specimen Signature:	

First Name:		Residential Address: _____ _____ _____
Surname:		
Date of Birth:		
Nationality:		
Contact Tel. No.:		Postcode/Zip Code:
Email Address:		Country:
Position within the Company:		
Specimen Signature:		
First Name:		Residential Address: _____ _____ _____
Surname:		
Date of Birth:		
Nationality:		
Contact Tel. No.:		Postcode/Zip Code:
Email Address:		Country:
Position within the Company:		
Specimen Signature:		

Shareholders/Beneficial Owners			
Please list any shareholders or beneficial owners with a holding of 25% or more			
Full Name	Address	Date of Birth	Holding %
Company Directors			
Please list any company directors			
Full Name	Address	Date of Birth	
Declaration of Politically Exposed Persons			

Are any of the authorized representatives, directors or business owners (owning 25% or more of the company) politically exposed persons? e.g – are they senior military, government, or political officials, or relatives or associates of such officials? If yes, please provide detailed information about such persons (if necessary please continue on an additional sheet).

Yes  No

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**Declaration**

In signing and returning this form I confirm for and on behalf of the applicant that:

1. We have full power and authority to enter into the Customer agreement with SENTIENT Digital Exchange OU for and on behalf of the named applicant.
2. We have read, understood and agree to be bound by the Customer agreement together with all its appendixes, located at the website [www.sentient.exchange](http://www.sentient.exchange).
3. We declare that the information and documents we have provided as part of this application process is true and complete. We will notify you as soon as possible, but no longer than within two weeks, regarding any changes in the provided information;

Full name:

Position:

Date:

Signature: