



BITINTERPAY
BITCOIN EXCHANGE

AML POLICY

Bitinterpay OÜ

Legal form: private limited company

Registration number: 1445548,

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Anti-money Laundering and Know Your Customer Policy

The purpose of the Bitinterpay OÜ Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML/KYC Policy”) is to identify, prevent and mitigate possible risks of Bitinterpay OÜ being involved in illegal activity.

In accordance with international law, in particular:

- The Law of the Republic of Estonia “On the Prevention of Money Laundering and the Financing of Terrorism” of October 26, 2017,
- EU Directive No. 2015/849 of May 20, 2015 on Countering the Use of the Financial System for Money Laundering and the Financing of Terrorism,
- EU Directive 2018/843 of 05/30/2018 amending Directive (EU) 2015/849 on preventing the use of the financial system for the purposes of money laundering and terrorist financing, and Directive 2009/138 / EC and 2013/36 / EC ,
- Directive 2014/65 / EC dated January 3, 2018, “On the markets for financial instruments”,
- EU Directive 2015/2366 on the provision of payment services (PSD2) from 01/13/2018,
- EU Regulation No. 2015/847 of May 20, 2015, “On the Information Accompanying the Transfers of Funds”,
- The International Convention for the Suppression of the Financing of Terrorism, adopted by Resolution No. 54/109 of the United Nations General Assembly of December 9, 1999,
- Forty recommendations FATF from 06.06.2003,

Bitinterpay OÜ has implemented effective internal procedures to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to react correspondingly in case of any form of suspicious activity from its Users.

AML/KYC Policy includes Verification procedures, Compliance Officer, Monitoring Transactions, Risk Assessment.

Customer due diligence (“CDD”) has become one of one of the international standards

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for preventing illegal activity. Thus, Bitinterpay OÜ has implemented its own verification procedures within the rigorous standards of anti-money laundering and “Know Your Customer” procedures.

The Bitinterpay OÜ identification procedure requires the User to provide Bitinterpay OÜ with reliable, independent source documents, data or information (for example, a national ID card, an international passport, an extract from the bank, a utility bill). For such purposes, Bitinterpay OÜ reserves the right to collect the User’s identification information for the purposes of AML / KYC Policy compliance.

Bitinterpay OÜ will take steps to confirm the authenticity of documents and information provided by Users. Bitinterpay OÜ reserves the right to investigate the cases of certain Users whose identities have been identified as dangerous or suspicious.

Bitinterpay OÜ reserves the right to verify the identity of the User on an ongoing basis, especially when its identification information has been changed or its activities appear suspicious (unusual for a particular User). In addition, Bitinterpay OÜ reserves the right to request from the Users current documents, even if they have been authenticated in the past.

Information about the user’s identification will be collected, stored, shared and protected strictly in accordance with the Bitinterpay OÜ Privacy Policy and relevant rules.

After confirming the identity of the user, Bitinterpay OÜ may refuse potential legal liability in a situation where the company’s services are used to conduct illegal activities. Users who intend to use payment cards for the purpose of consuming services must undergo a card check in accordance with the instructions available on the Bitinterpay OÜ website.

The Compliance Officer is the person, duly authorized by Bitinterpay OÜ, whose duty is to ensure the effective implementation and enforcement of the AML/KYC Policy. It is the Compliance Officer’s responsibility to supervise all aspects of Bitinterpay OÜ anti-money laundering and counter-terrorist financing, in particular collecting Users’ identification information, establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations, monitoring transactions and investigating

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any significant deviations from normal activity, implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs, updating risk assessment regularly, providing law enforcement with information as required under the applicable laws and regulations.

The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

Therefore, Bitinterpay OÜ relies on data analysis as a risk-assessment and suspicion detection tool. Bitinterpay OÜ performs a variety of compliance-related tasks, including capturing data, filtering, record-keeping, investigation management, and reporting.

In connection with the AML/KYC Policy, Bitinterpay OÜ will monitor all transactions and it reserves the right to ensure that transactions of suspicious nature are reported to the proper law enforcement through the Compliance Officer; request the User to provide any additional information and documents in case of suspicious transactions; suspend or terminate User's Account when Bitinterpay OÜ has suspicion that such User engaged in illegal activity.

However, the above list is not exhaustive and the Compliance Officer will monitor Users' transactions on a regular basis in order to define whether such transactions are to be reported and treated as suspicious or are to be treated as bona fide.

Bitinterpay OÜ, 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 Bitinterpay OÜ is able to ensure that measures to prevent or mitigate money laundering and terrorist financing are commensurate to the identified risks.

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