

RICHMINT DIGITECH SERVICES OÜ

KNOW YOUR CUSTOMER AND ANTI-MONEY LAUNDERING POLICY

RICHMINT DIGITECH SERVICES OÜ, a company incorporated in Estonia, with registry code 16335932 and its registered office at Parnu Maakond, Parnu Linn, Papiniidu TN 5-706, 80042, Estonia (“RICHMINT”) requires identity verification and other screening procedures to protect itself from involvement in any money laundering or other criminal activities. You shall be required to provide certain personal information.

For individuals, the following information shall be required:

- a) Name,
- b) Address,
- c) Phone Nnumber,
- d) Email Address,
- e) Nationality,
- f) Photographic proof of identity (passport copy or national ID),
- g) a selfie holding the identity proof and showing the date on which selfie was taken, and,
- h) information regarding source of fund.

RICHMINT may also require you to furnish proof of residence (utility bill or bank statement).

Besides the above, a confirmation stating the following shall be required:

- a) You are not and you have never been an un-discharged bankrupt
- b) You have never been convicted of a criminal offence involving fraud, dishonesty or any other criminal offence



- c) Fraud or dishonesty has not been proven against you in any civil proceedings
- d) You have never been the subject of a judicial or any other official enquiry/investigation (including taxation, money laundering and/or terrorism financing/links)
- e) You have never been the subject of investigation, proceeding or another enquiry by a self-regulatory organisation of which you are or were a member
- f) Neither you, nor a family member nor a close associate has been entrusted (currently or previously) with a prominent public function, such as head of state or government
- g) You are not a politically exposed person
- h) You are not in contravention of any applicable laws and regulations, including taxation and/or anti-money laundering regulations or conventions
- i) You are acting solely on your behalf and not on behalf of any other individual or legal entity
- j) You are not a Sanctioned Person. “Sanctioned Person” means a person or entity who is (a) acting in interests of or on behalf of government of a Sanctioned Country; (ii) a Sanctioned Organisation or a member thereof; or (iii) is otherwise subject to Sanctions. “Sanctioned Country” means a country or territory that is subject to Sanctions including, without limitation, North Korea. “Sanctioned Organisation” means an organisation that is subject to Sanctions. “Sanctions” means any sanctions, prohibitions, restricted list, specially designated persons or entities lists, indictments, arrest warrants or similar lists, instruments or measures issued by Estonia, the United Nations, the European Union, the United States, the United Kingdom, Switzerland, or the NATO.



- k) You are not acting on behalf of a Sanctioned Person or terrorist or terrorist organisations, including those persons or entities that are included on the List of Specially Designated Nationals and Blocked Persons maintained by the US Treasury Department's Office of Foreign Assets Control (OFAC) or on any lists or resolutions issued by Estonia or the United Nations (whether through the Security Council or otherwise) or the UK or the European Union pursuant to which dealings with persons specified therein are prohibited, restricted or discouraged, as such lists may be amended from time to time. Further, you do not feature on any of those lists.

For corporate entities, the following information shall be required:

- a) Certified copy of Certificate of Incorporation
- b) Certified copy of Memorandum and Articles of Association or Constitution or Partnership/Trust Deed
- c) Certified copy of Register of Directors & Members (or partners in case of partnerships or settlors, trustees, beneficiaries and executors)
- d) Individual due diligence (as above) for directors (or partners in case of partnerships or settlors, trustees, beneficiaries and executors)
- e) Individual due diligence (as above) for share holders holding $\geq 10\%$ of the shares/interest in the legal entity.



You agree and authorize RICHMINT to require information from you directly or through a third party and you understand and agree RICHMINT has right to not permit any deposits, trades and withdrawals until proof satisfactory to RICHMINT in its sole discretion is received and reviewed.

The AML Policy of RICHMINT is designed to prevent money laundering, including the need to have adequate systems and controls in place to mitigate the risk of the firm being used to facilitate financial crime.

RICHMINT conducts a comprehensive and thorough customer due diligence, ongoing analysis and reporting. This includes monitoring of, and for, suspicious transactions and reporting to national and international authorities and regulators. RICHMINT needs to keep certain information and documentation on file pursuant to applicable law and its contractual relationships, and RICHMINT hereby expressly reserves the right to keep such information and documentation. This will apply even when you terminate your relationship with RICHMINT or abandon your application to have an account with RICHMINT. RICHMINT may, at any time, require further information and documents from you.

This policy is governed by the laws of Estonia; and, any dispute, controversy, or claim arising out of, or in connection with, this policy, shall be finally settled by arbitration in accordance with the Rules of Arbitration Court of the Estonian Chamber of Commerce and Industry (“AC-ECCI”). The number of arbitrators shall be one and shall be appointed by AC-ECCI; the seat of the arbitration shall be Tallinn, Estonia; and the arbitral proceedings shall be conducted in English language. The decision of the arbitrator shall be enforceable by any court of competent jurisdiction.

