

**Introduction:**

At Hashtrix s.r.o., we are committed to maintaining a secure and compliant environment for our customers. As a Czech Republic-based crypto exchange company, we adhere to the highest standards of Anti-Money Laundering (AML) and Know Your Customer (KYC) practices. This policy outlines the measures we have implemented to prevent money laundering, terrorist financing, fraud, and other illicit activities. By adhering to this policy, we ensure the integrity of our platform and promote a safe trading experience for all our clients.

**Customer Due Diligence (CDD):****1. Identity Verification:**

- a) Before you can start trading on our platform, we require you to complete a comprehensive identity verification process.
- b) You will need to provide the following information:

Full name

Date of birth

Residential address

Nationality

Valid identification document details (e.g., passport, ID card)

- c) To ensure the authenticity of your identification documents, we may employ electronic verification services and third-party providers.

**Risk Assessment:**

- a) We conduct a risk assessment of each customer based on factors such as transaction volumes, source of funds, geographic location, business type, and customer behaviour.
- a) This assessment helps us determine the appropriate level of due diligence required for each customer.

**Ongoing Monitoring:**

- a) We monitor your transactions and activities on an ongoing basis to detect any suspicious or unusual patterns.
- b) We conduct regular reviews of customer accounts and assess any changes in customer behaviour or risk profile.

**Reporting Suspicious Activities:**

If we identify any suspicious activity, we are committed to promptly reporting it to the appropriate Czech Republic authorities, as required by law. We maintain records of all suspicious activity reports (SARs) and cooperate fully with law enforcement agencies during investigations.

**Compliance Officer:**

We have appointed a dedicated compliance officer who oversees the implementation and enforcement of our AML/KYC policy. They ensure that our company stays updated on relevant AML/KYC laws and regulations and ensure our strict adherence to them.

**Training and Awareness:**

Our employees receive regular training programs to stay informed about AML/KYC regulations, procedures, and the identification of suspicious activities. All employees undergo training upon joining our company, and refresher training is provided periodically to ensure their knowledge remains up to date.

**Data Protection:**

We implement robust security measures to protect your data from unauthorized access, loss, or disclosure. We adhere to applicable data protection laws and regulations, ensuring the confidentiality and integrity of your information.

**Record Keeping:**

We maintain accurate records of customer information, transaction details, and identity verification documents for the minimum period required by law. These records are securely stored and made available to regulatory authorities upon request.

**Cooperation with Regulatory Authorities:**

We cooperate fully with Czech Republic regulatory authorities and provide them with all necessary information and assistance as required by law.

**Program Review:**

Our AML/KYC policy undergoes regular reviews to ensure its effectiveness and compliance with changing laws and regulations. We make necessary updates or modifications to the policy as required to maintain its relevance and effectiveness.

By adhering to these AML/KYC measures, we aim to create a secure and transparent trading environment for our valued clients. We appreciate your cooperation and understanding in helping us combat money laundering, terrorist financing, and other illicit activities.

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