

## ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY

**Effective Date:** 12 March 2025

B2cash's AML/CTF policy aims to identify, prevent, and mitigate the risk of the company's involvement in illegal activities. Financial institutions and related entities, including cryptocurrency exchanges, are often targeted for money laundering and terrorist financing attempts.

Financial institutions and related entities — including cryptocurrency exchanges — are frequently targeted by individuals or organizations attempting to conduct money laundering or terrorist financing. **Anti-Money Laundering (AML)** refers to the laws, regulations, and procedures designed to prevent criminals from concealing illicitly obtained funds as legitimate income. **Terrorist financing** is the process of providing financial or material support to individuals or groups engaged in terrorism. This includes not only direct funding, but also activities such as fundraising, resource provision, possession of funds, and any financial arrangements in support of terrorism.

In compliance with international and local regulations, B2cash has implemented effective internal controls to prevent:

- Money laundering
- Terrorist financing
- Drug and human trafficking
- Proliferation of weapons of mass destruction
- Corruption and bribery

The company promptly investigates and addresses any suspicious client activity.

A designated **Money Laundering Reporting Officer (MLRO)** is responsible for implementing the AML/CTF policy, overseeing compliance, monitoring suspicious transactions, liaising with authorities, and ensuring staff training.

### 1. Verification Procedure

Before accessing and using B2cash services, all customers must undergo identity verification to prevent money laundering and terrorist financing. Applicable laws require financial institutions to obtain, verify, and record information identifying each individual or entity wishing to conduct business with us.

B2cash will request the customer's full name, address, date of birth, and other relevant details regarding the customer, their organization, or related persons necessary to confirm their identity.

Customers deemed by B2cash to present a higher risk may be subject to enhanced due diligence, which can involve providing additional documents and extending verification timelines.

B2cash reserves the right to:

- Verify customer identity on an ongoing basis, particularly when identification data changes or activities appear unusual;
- Request updated documents at any time, even if previously authenticated.

All identification data is collected, stored, shared, and protected in strict accordance with the B2cash Privacy Policy and applicable legal requirements.

## 2. Assessment of Risk

To comply with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) requirements, B2cash applies a **risk-based approach**. This approach allows the company to identify, assess, and understand the risks of money laundering and terrorist financing to which it may be exposed, and to implement proportionate mitigation measures based on the assessed risk level.

## 3. Risk Categories

### 3.1. Risk by Customers

B2cash considers certain customer-related factors as potential indicators of heightened risk. Suspicious circumstances may include, but are not limited to:

- Discrepancies in submitted identification documents
- Use of a fictitious identity or stolen identity
- Counterfeit identification documents
- Post box used as a residential address
- Record of previous financial crimes
- Inclusion on terrorist watchlists or being a wanted person
- Absence of a valid contact phone number
- Expired or invalid documents
- Inconsistencies in documents submitted for legal entities

Additionally, **Politically Exposed Persons (PEPs)** are considered higher-risk customers. This category includes, but is not limited to, individuals holding or having held the following prominent public functions:

- Head of state or government, minister, deputy or assistant minister

- Member of parliament or equivalent legislative body
- Member of a governing body of a political party
- Member of a supreme court, court of auditors, or the board of a central bank
- Ambassador, chargé d'affaires, or high-ranking military officer
- Member of an administrative, management, or supervisory body of a state-owned enterprise
- Director, deputy director, or board member (or equivalent) of an international organization

Middle-ranking or junior officials are not considered PEPs for the purpose of this classification.

### 3.2. Risk by Countries

In accordance with the Anti-Money Laundering Directive, B2cash applies enhanced due diligence measures to business relationships or transactions involving **high-risk third countries**. These measures may include:

- Obtaining additional information on the customer and beneficial owner
- Identifying the source of funds and source of wealth
- Establishing the purpose and intended nature of the transaction
- Obtaining approval from senior management before establishing or continuing the business relationship

Such requirements are designed to ensure that any engagement with high-risk jurisdictions is subject to heightened scrutiny and appropriate risk mitigation.

### 4. Monitoring of the Customer's Activities

To ensure effective detection and prevention of fraudulent, illegal, or unlawful activities, B2cash conducts both **ongoing and retrospective** monitoring of its customers and their transactions.

All transactions are subject to monitoring. Any activity deemed suspicious will be thoroughly investigated and, if necessary, reported to the relevant authorities. Where appropriate, B2cash may apply additional restrictive measures to prevent money laundering or terrorist financing.

In the event of suspicious transactions, B2cash may request additional information and supporting documents from the customer.

B2cash reserves the right to suspend or terminate the business relationship if there are reasonable grounds to suspect that the customer is engaged in illegal activities.

## **5. Reporting of Suspicious Activities to Respective Authorities**

In accordance with its AML Policy and applicable legal requirements, B2cash will report to the relevant authorities any activities that may be reasonably suspected of constituting money laundering or terrorist financing.

B2cash will not disclose to any customer or third party that such a report has been made, nor will it respond to inquiries related to the existence or content of such reports, in order to comply with legal confidentiality obligations.