

CCX EXCHANGE ANTI MONEY LAUNDERING AND COUNTER TERRORIST FINANCING POLICY

1. The below is a summary of the Anti-Money Laundering and Counter Terrorist Financing prevention Policy (“**AML Policy**”) of **COTI Exchange (Gibraltar) Limited** (“**Exchange**”, “**we**,” “**us**” or “**our**”). Any questions relating to this policy should be directed to **MLRO@ccx.io**.
2. The purpose of this AML Policy is designed to articulate our commitment to detecting, preventing and reporting attempts to use the Exchange to illegally launder money, to finance illegal activities such as terrorism and drug trafficking, or to commit fraud (all activities being “**Prohibited Activities**”).
3. In the event we suspect that you (“**you**”, “**your**” means a Participating Merchant and/or a Purchaser as defined in the Terms and Conditions) are abusing the Exchange for the purposes of Prohibited Activities, we reserve the right to suspend your use of the Exchange and freeze any funds in fiat currency and/or CCX Coins and/or the conversion or sale process, pending the outcome of an internal investigation whether with or without prior notice (if at all) in compliance with the applicable laws and regulations. We reserve the right to report any suspicious activities to the police and/or relevant authorities without your knowledge.
4. In relation to the Prohibited Activities, we have:
 - (i) Appointed a Money Laundering Reporting function/Policy;
 - (ii) Adopted a risk based approach towards assessing and managing the money laundering risks to the business;
 - (iii) Adopted and maintain risk-based customer due diligence and obtain identification and proof of address in accordance with the KYC (know your customer) procedure which includes enhanced due diligence checks in cases that we consider as of a higher risk; this will be determined at our sole discretion;
 - (iv) Practice risk-based systems and procedures to monitor your ongoing activity;
 - (v) Have in place an internal procedure for flagging and reporting suspicious activity.
5. As part of our AML Policy, you understand that whereas you agree to use the Exchange, you are also prepared to provide any documentation which we find relevant in order to serve our KYC and AML policies, including (but not limited to):
 - (i) Copy of valid official proof of identity of any individual associated with your activity;

- (ii) Copy of proof of residence not older than 2 months old of any individual associated with your activity;
 - (iii) Reference regarding the source of wealth and/or funds of any individual associated with your activity;
 - (iv) Certificate of incorporation of any legal person associated with your activity;
 - (v) Memorandum & Articles of Association of any legal person associated with your activity;
 - (vi) List of Shareholders (including ownership structure) and Directors and Signatories of any legal person associated with your activity;
 - (vii) Certificate of Incumbency stating the registered address, share capital, shareholder(s) and the person/s authorized to represent the legal person NOTARIZED and APOSTILLED of any legal person associated with your activity;
 - (viii) Any additional information we may find valid for assessing the risk of offering you with our services.
6. If you are acting on behalf of a legal person you will be required to send us the aforementioned KYC documents with a company stamp and certified as a true copy of the original by a lawyer, certifying officer or a Notary public.
7. We require the KYC documents to be sent to us in high quality colour format. We reserve the right to reject any documents, which do not comply with the above.
- We reserve the right to require additional information at any time to verify your identification and any further information that we may require.
8. We may also disclose any and/or all of the KYC documents to any relevant authority and/or institution in order to examine, inter alia, your status concerning bankruptcy, reputation checks and criminal records and/or in order to comply with AML laws, regulations, rules or anything related thereto.
9. We restrict certain jurisdictions, type of businesses and certain individuals from becoming our clients and/or consume our services. We apologise in advance for not being able to service you or for the need to terminate the services with an immediate effect under these circumstances. The AML Policy does not a substitute your need to comply, in full, with the applicable laws and regulations in connection with your business conduct, personal characteristics and legal status. We do not offer any consultancy in connection with your need to comply with the applicable laws and regulation.
10. We may change this policy, at our own discretion, from time to time in compliance with the dynamic applicable laws and regulation framework without a notice, it is your sole obligation to get updated and adhere the applicable laws and regulation

associated with your consumption of services from us as well as with your business conduct.