

DEXIMUM

AML\KYC POLICY

Date of the last update: June 1, 2021

In order to comply with international guidelines and regulations of anti-money laundering (AML), Deximum carries out a group of actions aimed at revealing criminally-obtained funds and their legalization countermeasures in correspondence with the international requirements, which are detailed further below.

KNOW YOUR CUSTOMER AND DUE DILIGENCE

- At the moment of starting a relationship with the Client, the Company identifies the Client and verifies his identity by necessary data.
- During account registration Client provides the Company with identification information, including but not limited to: Client's first name, last name, mobile number and related info.
- The Company shall monitor the Client due diligence and accounts on a regular basis in order to determine the level of risk they pose and to reveal whatever changes in information about the Client.
- If the Company believes that business relationship with the Client may inflict a potentially high risk of money laundering or terrorism financing, Company is entitled to ask for whatever additional data and documents deemed necessary in the situation.
- The Client is obliged to inform immediately of any changes in the personal or contact information.

DEPOSIT/WITHDRAWAL POLICY

- In order to minimize the risk of money laundering and terrorism financing the Company neither accepts nor pays off cash money under no circumstances.
- The Company reserves the right to block an account at any time, if the Company believes that activity at this account might be connected with money laundering or criminal activity. The Company is obliged to unblock the account in case such activity was not registered.
- The Company reserves the right to refuse processing a transaction at any stage, if the Company believes the transaction may be in any way connected with money laundering or criminal activity.
- According to international legislation, the Company is prohibited from informing the Client that they have been reported to officials for suspicious account activity.

PERSONNEL TRAINING

- Employees who are dealing with clients or are involved in any AML checking, verification or monitoring undergo AML training. Each new employee has to follow an AML training plan.
- The AML training program includes suspicious transactions identification training as well as training in prevention, detection and reporting of money laundering and terrorism financing crimes.
- Any violation of the AML policy must be reported to the AML compliance officer, unless the violation implicates the AML Compliance Officer, in which case an employee must report the violation to the CEO.