

## **AML/CTF Policy**

These days money laundering (ML) and terrorist financing (TF) are one of the biggest challenges faced by the crypto community. CoinGate considers ML/TF as a serious threat to its activities, and therefore introduces and implements its Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) Policy in accordance with the relevant legal acts, recommendations, guidelines and best practices in the field. CoinGate is committed to providing a reputable, reliable and secure services with high standards of integrity and transparency, in full compliance with applicable laws and global standards.

The following are key elements of the CoinGate AML/CTF Policy:

- Customer Due Diligence;
- Risk Assessment;
- Ongoing Monitoring;
- Record Keeping;
- Communication with Competent Authorities.
- Customer Due Diligence.

Customer due diligence information comprises the facts about a customer that should enable CoinGate to assess the extent to which the customer exposes it to a range of risks. Customer due diligence information is obtained from the customer before establishing the business relationships with him/her/it. CoinGate also verifies the obtained information against reliable and independent sources.

By collecting and verifying the customer's information the Company aims to form a reasonable belief as to the true identity of the customer. CoinGate must also understand the business of the customer to make sure that the customer does not launder illicit funds through CoinGate and/or these funds will not be used for TF.

Information, documents and data provided to CoinGate during identification of the customer are processed in accordance with CoinGate Privacy Policy.

### **Risk Assessment**

While assessing the risks, CoinGate applies the risk-based approach. It means that CoinGate has an understanding of the ML/TF risks to which it is exposed and applies AML/CFT measures in a manner and to an extent which would ensure mitigation of these risks. This flexibility enables CoinGate to focus its resources and take enhanced measures in situations where the risks are higher.

### **Ongoing Monitoring**

CoinGate performs an ongoing monitoring of the business relationships with customers. Ongoing monitoring is performed on all business relationships regardless of their risk rating

under the risk-based approach. However, the degree and nature of monitoring will depend on the risk rating of the customer and the particular service provided.

Ongoing monitoring allows CoinGate to gain deeper insights into customers' profiles and behaviours and strengthen risk-based allocation of resources to tackling higher risk areas.

#### Record Keeping

CoinGate maintains appropriate records in relation to every customer, with the idea being that maintaining an adequate audit trail is a significant component of combating ML/TF.

Record keeping is essential to facilitate effective investigation, prosecution and confiscation of criminal property. If the funds used to finance terrorist activity cannot be traced back through the financial system, then the sources and the destination of terrorist financing will not be identified.

#### Communication with Competent Authorities

Upon suspicion or any knowledge that the property of any value is directly or indirectly derived from criminal activity or participation in such activity, or that the intended purpose of property is to sponsor one or several terrorists or terrorist organization, CoinGate will report that to the competent authorities and will cooperate on any follow-up actions.