

SWAPZONE ANTI-MONEY LAUNDERING (AML) POLICY

1. OBJECTIVE OF THE AML POLICY

1.1. Swapzone (the **Company**) staff is committed to pursue the highest standards of AML/CFT and Know Your Business (KYB) to mitigate the risk of Swapzone services being used to facilitate financial crimes.

1.2. Swapzone has implemented the AML/CFT Policy to ensure that all the necessary procedures are taken in order to achieve full compliance.

2. AML POLICY

2.1. AML Policy is the procedure to prevent the Company's services from being used for purposes of money laundering, terrorist financing or any other criminal activity. KYB measures are part of the AML Policy. The objective of KYB measures is to enable Swapzone to know their customers and be able to mitigate the above mentioned risks. The Company may update such procedures in the future to assure the compliance with best AML practice.

3. MEASURES RELATED TO KYB AND SCREENING

3.1. The Company shall identify the customer i.e. legal entities which are partnered with Swapzone who wants to use or who is using the Company's services. Such customers of the Company must finish an identification and verification procedure and provide all required information.

Corporate customers

Information collected	Purpose of collection of data
- legal name of the customer	<ul style="list-style-type: none">• to provide the Company's services• to resolve the customer's claims;• to communicate with the customer• Others (such as requests from the law-enforcement bodies etc.)
- date of incorporation of the customer	
- customer's email	
- customer's place of incorporation	
- address of the customer's payment wallet	
- description and nature of the customer's business	

The customer shall provide the Company with following valid documents serve as basis for identification:

- a high-resolution copy of the certificate of incorporation (an extract from the Commercial Register or equivalent document, evidencing the registration of the corporate customer);
- names and addresses of all directors and beneficial owners of the corporate entity.

The Company shall identify the beneficial owners (UBOs) and, for the purpose of verifying their identities, taking measures to the extent that allows the Company to make certain that it knows who the beneficial owners are, and understands the ownership and control structure of the corporate customer, or of the person participating in the transaction. A representative of the corporate customer must submit a document certifying his/her powers (a power of attorney), which has been authenticated by a public notary and/or legalized and/or certified with an apostille, unless otherwise provided for in an international agreement.

3.4. All the information and documents provided by the customer shall be completely clear and readable.

3.5. The customer agrees to provide additional information and documents on the request of the Company within a reasonable period of time.

3.6. The Company reserves the right to impose additional due diligence requirements to accept the customers residing in certain countries.

3.7. In case of any suspicious activity, false documents or non-cooperation by the customer within the customer due diligence process, the Company is obligated to reject the customer's documents, close any existing accounts, and terminate the business relationship.

4. MONITORING

4.1 In addition to gathering information from the customers, the Company may continue to monitor information on the customer.

5. SANCTIONS POLICY

5.1. Swapzone is prohibited from transacting with companies and countries that are on prescribed sanctions lists. Swapzone will therefore screen its customers against international sanction lists on a periodical basis

6. MISCELLANEOUS

6.1 Proposals and claims to the Company related to this Policy may be sent to the email address: compliance@swapzone.io

6.2 Persons responsible for ensuring AML compliance:
Swapzone AML Compliance Officer:

A handwritten signature in black ink, appearing to be the name 'Wang' written in a cursive, stylized font.

Verified and signed on September 1, 2021