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# BETCONIX

AML POLICY.



## AML policy

Policy to combat legalization of the proceeds of criminal activities is designed to prevent BETCONIX from being involved in any illegal activity.

This policy to combat legalization of the proceeds of criminal activities (hereinafter referred to as the «AML Policy») describes the procedures and mechanisms used by the BETCONIX Service to counter money laundering.

In accordance with international and local statutory enactments, BETCONIX applies effective internal tools to prevent money laundering and adheres to the following rules:

- do not engage in business relationships with criminals and / or terrorists;
- do not process transactions that are the result of criminal and / or terrorist activities;
- not facilitate any transactions related to criminal and / or terrorist activities.

### Verification procedure

The BETCONIX service has created its own «Verification procedures» in accordance with the standard anti money laundering - the «Know Your client» policy.

BETCONIX users are currently undergoing the verification procedure at their own request (provide a government identification document: passport, driving license or ID card), this method will be changed soon.

BETCONIX reserves the right to collect User identification information for the purposes of the AML Policy. This information is processed and stored strictly in accordance with the BETCONIX privacy Policy.

BETCONIX can request a second document to identify the User: bank statement or utility bill no older than 3 months, which indicates the full name of the User and his actual place of residence.

BETCONIX reserves the right to monitor the User's data on an ongoing basis, especially when his identification information was changed or his activity seemed suspicious (extraordinary for a specific user). In addition, BETCONIX reserves the right to request up-to-date documents from Users, even if they verified in the past.

If the user's identification information was changed or their activity appears suspicious, the BETCONIX Service has the right to request up-to-date documents from Users, even if they verified in the past.

After confirming the identity of the user, BETCONIX may refuse to provide services to the User in a situation where BETCONIX services are used to conduct illegal activities.

BETCONIX verifies the authenticity of documents and information provided by Users, and reserves the right to receive additional information about Users who have been identified as dangerous or suspicious users.

### OFFICER RESPONSIBLE FOR COMPLIANCE WITH AML POLICY

The Responsible Officer for Compliance with AML Policy is an employee of BETCONIX, whose responsibility is to ensure effective compliance with this Policy. The responsibility of such a Responsible Officer is the following methods:

- collection of User identification information;
- creating and updating internal policies and procedures for writing, reviewing, submitting and storing all reports required by existing laws and regulations;



- monitoring of transactions and analysis of any significant deviations from the normal activities of Users;
- implementation of a records management system for storing and searching documents, files, forms and logs;
- regular updating of the risk assessment.

The Responsible Officer for Compliance with AML Policy has the right to interact with law enforcement agencies involved in the prevention of money laundering, terrorist financing and other illegal activities.

### **MONITORING TRANSACTIONS**

Monitoring of the User's transactions and analysis of the received data is also a tool for assessing risk and detecting suspicious transactions. If money laundering is suspected, the BETCONIX Service controls all transactions and reserves the right to:

report suspicious transactions to relevant law enforcement agencies;

ask the User to provide any additional information and documents in case of suspicious transactions;

suspend or terminate the User's account if such User is involved in illegal activities.

The above list is not exhaustive. The Responsible Officer for Compliance with AML Policy monitors Users' transactions on a daily basis to determine whether they should be reported and considered suspicious.

### **RISK ASSESSMENT**

BETCONIX, in accordance with international requirements, adopts a risk-based approach to combat money laundering and terrorist financing. Thus, by applying risk assessment practices to combat money laundering, BETCONIX provides that measures to prevent or deter money laundering and terrorist financing are commensurate with the identified risks.

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