Anti-Money Laundering (AML) Policy

# Introduction

1.1. This Anti-Money Laundering (AML) Policy sets out the measures that our crypto exchange company BlockChanger Ltd takes to prevent and detect money laundering, terrorist financing, and other financial crimes.

1.2. Our AML Policy applies to all our employees, agents, contractors, and customers.

# Customer due diligence

2.1. We conduct customer due diligence (CDD) on all our customers before allowing them to use our services.

2.2. CDD includes, but is not limited to, the following measures:

Collecting and verifying the customer's identity information

Assessing the customer's risk level based on their identity, transaction history, and other relevant factors

Monitoring and analyzing the customer's transactions to detect suspicious activity

2.3. We may use third-party service providers to perform CDD.

2.4. We reserve the right to refuse to provide our services to any customer if we are unable to complete satisfactory CDD.

Suspicious activity monitoring and reporting

3.1. We monitor and analyze all our customers' transactions to detect suspicious activity.

3.2. Suspicious activity includes, but is not limited to, the following:

Transactions involving large amounts of money or high value assets

Transactions involving high-risk countries or individuals.

Transactions that are inconsistent with the customer's known financial profile or business activities

Transactions that involve complex or unusual payment arrangements

3.3. If we detect any suspicious activity, we will report it to the relevant authorities in accordance with applicable laws and regulations.

Employee training and awareness

4.1. We provide regular training to all our employees on AML policies and procedures.

4.2. We ensure that all our employees are aware of their legal obligations to prevent and detect money laundering and terrorist financing.

### Compliance monitoring

5.1. We regularly review and update our AML policies and procedures to ensure they are up-to-date and effective.

5.2. We appoint a designated compliance officer who is responsible for monitoring our compliance with AML regulations.

5.3. We cooperate with regulatory authorities and law enforcement agencies to ensure compliance with applicable laws and regulations.

#### Record keeping

6.1. We maintain records of all customer information, transactions, and other relevant data in accordance with applicable laws and regulations.

6.2. We retain records for the prescribed period as required by law.

#### Sanctions screening

7.1. We conduct sanctions screening on all our customers to ensure compliance with applicable sanctions laws and regulations.

7.2. We use third-party service providers to perform sanctions screening.

7.3. We reserve the right to refuse to provide our services to any customer if they are subject to sanctions.

# Governing law

8.1. This AML Policy is governed by the laws of Bulgaria.

We hope this example helps. However, please keep in mind that this AML Policy is only a sample and may need to be customized to meet the specific needs and requirements of your crypto exchange company. It is always a good idea to consult with legal counsel to ensure that your AML Policy is legally compliant.