

# AML POLICY

BillLine adheres to the highest standards in the fight against money laundering (AML) and financial terrorism and requires the management and employees of the company to follow these standards.

Money laundering is the process of converting funds obtained from illegal activities (fraud, corruption, terrorism, etc.) into other funds or investments that look legitimate, in order to hide or distort the real sources of this funds.

The following laws constitute the legal framework of Ukraine in preventing and combating the legalization (laundering) of funds, received from crime or the financing of terrorism:

- Law of Ukraine on Prevention and Counteraction to Legalization (Laundering) of Proceeds from Crime, Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction;
- Crimes Act; Code of Administrative Offences;
- The Law of Ukraine "On Prevention of Corruption".

The money laundering process can be divided into 3 consecutive stages:

- Accommodation. At this stage, the funds are converted into other financial instruments such as checks, bank accounts, money transfers or they can be used to purchase high-value goods with further resold. They can be invested in banks and non-bank institutions (for example, currency exchange offices). To avoid suspicion from the company, money launderer may make several investments instead of depositing the entire amount at once. This form of placement is called "smurfing" or "spraying".
- Splitting. Funds are transferred or transferred to other accounts and other financial instruments. Splitting is used in order to hide the origin and prevent the identification of a person who has carried out several financial transactions. Moving and changing the form of funds complicates the process of tracking money laundered.
- Integration. The funds are returned to circulation as legally received for the purchase of goods and services.

## AML Policy

BillLine, like most service providers in financial market, adheres to the principles of counteracting money laundering (AML) and actively prevents any actions aimed at facilitating the process of laundering illegally obtained funds. AML (Anti Money Laundering) means preventing the use of the company's services by criminal entities for the purpose of money laundering, terrorist financing or other criminal activities.

To do this our company has implemented a strict policy to detect, prevent and report all suspicious transactions to the appropriate authorities. At the same time, BillLine doesn't have the right to inform its client law enforcement agencies have been notified of its activities. We also implemented a complex electronic system for identifying each client of the company as well as a forming of the detailed history of all transactions.

In order to prevent money laundering, BillLine doesn't accept or pay out cash under any circumstances. The company reserves the right to suspend any client transaction may be considered illegal or related to money laundering based on the the opinion of our employees.

### **Company's procedures**

BillLine must ensure we're dealing with a real individual or legal entity. BillLine performs all necessary activities in accordance with applicable laws and regulations introduced in Ukraine. AML policy is done with:

- "Know Your Customer" (KYC) policy and legal expertise ;
- monitoring the client's activities;
- record keeping.

Since the company is committed to AML and KYC policies, each company's client must go through the verification procedure. Before starting any work with clients, BillLine makes sure the company will provide evidence or steps will be taken to provide evidence confirming the identity of any client or counterparty. The Company also pays special attention to clients who are residents of countries recognized by reliable sources as countries with insufficient AML levels and who pose a high risk due to crime and corruption, as well as beneficiaries and funds coming from these countries.

### **Individuals**

During the registration process, each client provides personal information, namely: full name, date of birth, country of residence, full address, including phone number and area code. In order to comply with the requirements for KYC and identity verification, as well as to confirm the specified information, if necessary, individual clients must provide the following documents at the request of the company:

A high-quality copy of a government-issued identity document containing: full name, date of birth, photo and citizenship, as well as a validity confirmation of the document (date of issue / expiration date), signature of the owner if necessary. Such ID document can be a passport, national ID-card, driver's license or other similar document. These documents must be valid for at least 6 months from the date of submission for consideration. The Company reserves the right to request certified copies of identification documents, in which case the certification must not be older than 6 months from the date of submission for consideration. The Company reserves the right to request another identity document.

The company reserves the right to apply other requirements and procedures during the process of accepting new clients during verification and review of documents. Such procedures are determined by the company in its sole discretion depending on the country of residence of the client and may include, but not be limited to:

- the need to provide a bank card used for adding / withdrawal of funds;
- the need to provide the source of funds, the source of origin of funds and proof of funds used for replenishment, in a form the company considers necessary.

### **Legal entities**

A copy of the extract from the EDRPOU.

A copy of the duly registered founding document of the current version with all applicable annexes to the document, if available (charter / memorandum of association / constituent act / regulation). Legal entities of public law, acting on the basis of laws, don't submit a constituent document. A legal entity created and/or operating on the basis of a model charter approved by the Cabinet of Ministers of Ukraine shall submit a copy of the decision on its creation or on the implementation of activities on the basis of a model charter signed by all founders.

A copy of orders and protocols, the decision of the owners on the appointment of persons entitled to dispose of the property and funds of the legal entity.

A copy of the passport of a citizen of Ukraine (or other identity document and, in accordance with the legislation of Ukraine, can be used on the territory of Ukraine to conclude transactions) of a person entitled to dispose of the property and funds of a legal entity.

A copy of the certificate of assignment to the RNOKPP or a copy of the passport of a citizen of Ukraine, with note of the refusal to accept the registration number of the registration card of the taxpayer of Ukraine of the person entitled to dispose of the property and funds of the legal entity.

#### **The customer ownership structure in a schematic representation.**

This procedure is carried out in order to identify the client and help BillLine to know the clients and their financial transactions in order to provide the best service.

#### **Client activity monitoring**

In addition to collecting information about clients, BillLine continues to monitor the activities of each client in order to identify and prevent any suspicious transactions. A suspicious transaction is a transaction that is contrary to the legitimate business of the client or its normal transaction history in accordance with the monitoring of the client's activities. BillLine has implemented a monitoring system for these transactions (both automatic and manual if necessary) to prevent criminals from using the company's services.