

KYC Policy for Bullionz.com

KYC Policy (Know Your Customer)

Effective date: 01.01.2024 (01 January 2024)

1. Purpose: BT Exchange UAB and BT Exchange CZ ("the Companies") are committed to maintaining the highest standards of integrity and compliance with regulatory requirements. The Know Your Customer (KYC) policy was established to prevent money laundering, fraud, and other financial crimes.

2. Client Identification and Verification:

- a. The Companies will verify the identity of all clients before conducting any transactions.
- b. Clients are required to provide accurate and up-to-date personal information, including name, address, phone number, and email.

3. Documentation Requirements:

a. Clients must provide valid government-issued identification, such as a passport, for identity verification.

4. Ongoing Monitoring:

- a. The Companies will monitor client transactions to detect and prevent suspicious activities.
- b. Clients are encouraged to promptly update their information in case of any changes.

5. Reporting Suspicious Activities:

- a. If the Companies suspects any unusual or suspicious activities, it will report them to the relevant authorities as required by law.
- b. The Companies reserves the right to refuse or terminate services for clients involved in suspicious activities.

Anti-Money Laundering Policy:

1. Commitment to AML Compliance: BT Exchange UAB and BT Exchange CZ ("the Companies") is committed to combating money laundering, terrorism financing, and other illicit financial activities. The Anti-Money Laundering (AML) policy is designed to ensure compliance with all relevant laws and regulations.

2. Risk Assessment:

- a. The Companies will conduct regular risk assessments to identify and evaluate potential money laundering and terrorism financing risks associated with its clients and transactions.
- b. Enhanced due diligence measures will be applied to high-risk clients and transactions.

3. Due Diligence and Reporting:

- a. The Companies will conduct thorough due diligence on all clients to verify their identities and assess the legitimacy of their transactions.
- b. Suspicious transactions will be reported to the appropriate authorities in accordance with regulatory requirements.

4. Training and Awareness:

- a. Employees will receive ongoing training to ensure awareness of AML regulations and their roles in preventing money laundering.
- b. Employees are encouraged to report any concerns or suspicions about client transactions.
- **5. Record Keeping:** a. The Companies will maintain accurate records of client transactions and due diligence measures for the prescribed retention period.

6. Non-Tolerance of Money Laundering:

- a. The Companies has a zero-tolerance policy for any involvement in money laundering, terrorism financing, or related activities.
- b. The Companies will cooperate fully with law enforcement agencies and regulatory authorities in cases of suspected money laundering.