KYC/AML Policy

The purpose of the Anti-Money Laundering and Know Your Customer Policy ("AML/KYC Policy") is to prevent money laundering and terrorist financing activities on the Service by complying with the requirements of international and domestic laws and implementing a user identification procedure.

Through the business of TransCheetah s.r.o we have already a database of existing companies in international trade of goods and services businesses. On top of it, we have used 3rd party data and developed a KYC scoring model, which maps the customers into 3 zones: Green, Yellow and Red.

We consider following risk categories: AML Risk, Sanction risk, Performance risk.

The model consists of several functions and weights of the function which target different risk areas.

We focus on the following factors in our model:

A = market check. We check if the company is known on the market and what is the reputation in the market. [Performance/AML]

B = financial check. We check the financial soundness of the company (3-5 years). [Performance]

C = UBO declaration / UBO – check. We check if the UBO of the company is the real economical beneficiary of the company and do a market check. [AML/Sanctions]

D = authenticity of cargo origin and pricing. We check the origins of the goods to bring transparency and avoid any sanctions. [AML]

E = sanctions. We check if the company/goods/UBO/production sites fall under any sanctions. The value is binary. [Sanctions]

F = political exposure / government relation. We check if the company/UBO/management has any government exposure (i.e. not PEP but working with PEPs, GOs, etc.). [Sanctions/AML]

G = management qualification. We check if the management is qualified enough to perform the declared transactions. [Performance]

H = affiliation check. We check other companies in the group if they have any negative kind of information. [AML/Sanctions/Performance]

General Provisions

1.1. The Company must comply with the requirements of the domestic and international laws on the prevention of money laundering and terrorist financing, as well as the requirements

of other laws and regulations, to the extent that they are related to the activities of the Company.

1.2. The company distributing the AML/KYC Policy may make changes and additions to it at its own discretion and will monitor compliance with its provisions and requirements.

2. Trade Services department employee

2.1. To control and implement the procedures reflected in the Policy, the Company appoints an employee of the trade services department.

2.2. The Trade Services department employee is responsible for collecting, analyzing, and investigating information about any suspicious activity as well as training the company's employees in the relevant procedures; The Trade Services department employee shall define procedures and rules for identifying Clients, verifying and monitoring unusual transactions.

3. Identification policy

3.1. In order to identify Clients, the Company requests the following documents:

- statement from the State/court registry of legal entities

- a document confirming the rights and powers of a person authorized to act on behalf of the company

- identity confirmation (passport, driver's license)

3.2. The KYC (Know Your Customer) procedure applies to users suspected of making illegal transactions. We may ask you for the following documents to prove your identity:

Identity proof documents:

- internal and / or foreign passport;

- identity card, ID card.

Address verification:

- Bank statement

- a receipt confirming the payment of a utility bil

4. Declaration of Conformity

4.1. The Corporate Client (an authorized employee of the Corporate Client) confirms that they have read and understood the current Policy and that they (or their company) must act in full compliance with the requirements and standards set out in the Policy and comply with all

applicable laws and other rules and requirements, governing its activities as a Corporate Client.

4.2. The Corporate Client (an authorized employee of the Corporate Client) acknowledges that it is responsible for its actions in accordance with applicable laws in the area discussed in this Policy, and is responsible for non-compliance with such laws.