



**DCC Payments UAB (trading as Cryptody)
Anti-Money Laundering and Countering the Financing of Terrorism Policy**



AML/CTF Policy

Anti-Money Laundering & Counter-Terrorism Financing Policy (“AML/CTF Policy”) sets out the processes and controls to help us prevent, identify, manage and mitigate risks of us being involved in any kind of illegal activity, in particular money laundering.

Money laundering is the process of hiding or disguising the source of illegally obtained funds to make them appear legitimate, for example, by filtering the money through the financial system. As such, companies that offer financial services are specifically targeted by criminals.

In response to the scale and effect of money laundering, local and international laws and regulations, including European Union directives, have been designed to combat money laundering and terrorism financing.

Our AML/CTF Policy covers the following:

- Customer Identification & Verification Procedures – we have adequate controls and procedures to ensure we know with whom we are conducting business, commonly referred to as Know Your Customer (KYC), including Enhanced Due Diligence (EDD) measures for customers deemed as higher risk, for example Politically Exposed Persons (PEPs).
- Transaction Monitoring & Ongoing Monitoring – we analyse transactional data and patterns as a risk-assessment and suspicion detection tool.
- Money Laundering Reporting Officer (MLRO) – we have appointed a MLRO, who has responsibility for oversight of compliance with the relevant legislations, regulations, rules and industry guidance.
- Risk Assessment and Management – we have adopted a risk-based approach to combating money laundering and terrorist financing. We achieve this by accurately measuring our users' risk profiles and implementing processes and controls that commensurate with identified risks. This allows us to allocate resources in the most efficient ways.
- Record Keeping – we maintain and keep appropriate records for legally prescribed periods;
- Reporting to FCIS – we report suspicious activity to the relevant law enforcement authorities;
- Sanctions Policy – we screen against the United Nations, European Union, UK Treasury and US Office of Foreign Assets Control (OFAC) sanctions lists;
- Employee Due Diligence and Risk Awareness Training – we screen all employees and conduct additional background checks on entrusted employees. We provide training for all relevant employees on an ongoing basis.