

AML/KYC Policy of SMOOTH TECH SP. Z O.O.

1. Purpose and Basis

At SMOOTH TECH SP. Z O.O., we are committed to upholding the highest standards of Anti-Money Laundering (AML) and Know Your Customer (KYC) practices. As a global leader in digital asset exchange, our primary objective is to prevent money laundering, terrorist financing, and related illicit activities that could undermine the integrity of the financial system and the protection of our customers. This policy is established in accordance with the applicable laws and regulations of the Poland and international standards, ensuring we address the risks associated with our diverse global clientele.

2. Scope of Application

This policy applies to all users of SMOOTH TECH SP. Z O.O.'s platform, including both individual and institutional clients. Users must comply with AML and KYC regulations as prescribed by the jurisdiction in which they operate. In cases where local regulations impose stricter requirements, those local regulations will take precedence. This policy is governed by and interpreted in accordance with laws of Poland.

3. Principles of AML and KYC

SMOOTH TECH SP. Z O.O. adopts a comprehensive approach to AML and KYC, adhering to the following principles:

- **Comprehensiveness:** We consider all risk factors associated with potential money laundering and terrorist financing, ensuring all users are appropriately monitored.
- **Prudence:** We employ rigorous identity verification processes and prudently monitor user risks.
- **Sustainability:** We respond to risks based on actual and specific circumstances, adapting our measures as necessary.
- **Confidentiality:** User identity and transaction information are kept confidential, disclosed only when legally required.
- **Hierarchical Management:** Risk-based reviews are conducted, with enhanced scrutiny applied to higher-risk users.

4. Customer Due Diligence (CDD)

- **Identity Verification:** Users must complete a thorough identity verification process before engaging in transactions. Required information includes:
 - Full name
 - Date of birth
 - Residential address

- Nationality
- Valid identification documents (passport, ID card)

To validate these documents, we may use electronic verification services and third-party providers.

- **Enhanced Due Diligence (EDD):** For high-risk users, SMOOTH TECH SP. Z O.O. will implement additional verification measures to mitigate potential risks.

5. Risk Assessment and Classification

- **Risk Assessment:** We assess each customer based on transaction volumes, source of funds, geographic location, and customer behavior. This assessment determines the level of due diligence required.
- **User Risk Classification:** Users are categorized into low, medium, or high-risk categories based on their profiles and transaction patterns.

6. Ongoing Monitoring

- **Transaction Monitoring:** We continuously monitor user transactions to identify suspicious or unusual patterns. This includes reviewing account activities regularly to detect any changes in risk profile.
- **High-Risk Users:** For high-risk users, we conduct semi-annual reviews to verify their identity, sources of funds, and overall financial status.

7. Reporting Suspicious Activities

If suspicious activities are detected, SMOOTH TECH SP. Z O.O. will promptly report them to the relevant Poland authorities and cooperate with law enforcement agencies. Records of Suspicious Activity Reports (SARs) are maintained and provided upon request.

8. Compliance Officer

A dedicated Compliance Officer oversees the implementation and enforcement of our AML/KYC policy. This officer ensures adherence to applicable laws and regulations and updates the policy as necessary to remain compliant with evolving standards.

9. Training and Awareness

Employees receive ongoing training to stay informed about AML/KYC regulations and procedures. Initial training is provided upon hiring, with periodic refresher courses to ensure continued compliance.

10. Data Protection

We implement robust measures to protect user data from unauthorized access, loss, or disclosure. Compliance with applicable data protection laws is strictly observed to ensure the confidentiality and integrity of user information.

11. Record Keeping

SMOOTH TECH SP. Z O.O. maintains accurate records of customer information, transaction details, and identity verification documents for the legally required minimum period. These records are securely stored and available for review by regulatory authorities.

12. Cooperation with Regulatory Authorities

We fully cooperate with regulatory authorities in Poland and provide all necessary information and assistance as required by law.

13. Policy Review and Updates

Our AML/KYC policy is regularly reviewed and updated to ensure effectiveness and compliance with changing laws and regulations. Adjustments are made as needed to maintain relevance and effectiveness.

14. Handling of Suspicious Conduct

If a user's conduct raises concerns or appears suspicious, SMOOTH TECH SP. Z O.O. reserves the right to suspend transactions, reject applications, freeze accounts, or take other measures as necessary. This includes reporting to authorities if required.

15. Confidentiality in AML Efforts

All staff involved in AML activities are required to maintain strict confidentiality regarding user information and any findings related to AML investigations. Disclosure is only permitted as required by law.

16. User Responsibilities

Users are prohibited from lending or renting their account details or identification documents.

17. Assistance to Judicial Investigations

SMOOTH TECH SP. Z O.O. will cooperate with judicial or law enforcement authorities and provide relevant information if requested in connection with investigations.

18. Interpretation and Effectiveness

This policy is subject to interpretation by SMOOTH TECH SP. Z O.O.. It takes effect immediately upon promulgation and remains in force until updated or replaced.

By adhering to these comprehensive AML/KYC measures, SMOOTH TECH SP. Z O.O. aims to foster a secure and compliant trading environment, protecting our clients and the broader financial system from illicit activities.