

## GENERAL PROVISIONS

1. This AML Policy, or rules of procedure for prevention of money laundering and terrorist financing, and compliance with international sanctions (hereinafter "Rules") has been developed by **PLEXICO INVESTMENT GROUP LLC**, a company registered in **66 West Flagler Street, Miami, United States, Florida**, registration number **33130** (hereinafter referred to as "Company"), in order to prevent entering into deals involving suspected money laundering and terrorist financing and to ensure identification and reporting of such. Any questions related to this policy should be addressed to:  
PLEXICO INVESTMENT GROUP LLC, 66 West Flagler Street, Miami, United States, Florida, or by email to support@plexico.com.
2. The obligation to observe the Rules rests with Management Board members and employees of the Company, including temporary staff and agents of the Company who initiate or establish a Business Relationship (as defined in section 2.6) (hereinafter collectively called "Representative"). Every Representative must confirm awareness of the Rules by signing.
3. The Rules are primarily based on the regulations of the Money Laundering and Terrorist Financing Prevention Act (hereinafter "the Act") and the International Sanctions Act (hereinafter "ISA").

## DEFINITIONS

1. **Money Laundering** — is a set of activities involving property derived from criminal activity or property obtained in place of such property with the purpose to:
  - I. Conceal or disguise the true nature, source, location, disposition, movement, right of ownership, or other rights related to such property;
  - II. Convert, transfer, acquire, possess, or use such property for the purpose of concealing or disguising the illicit origin of the property or of assisting a person involved in criminal activity to evade legal consequences;
  - III. Participate in, associate with, attempt to commit, or aid, abet, facilitate, or counsel the commission of any of the actions described in subsections I and II.
2. **Terrorist Financing** — refers to acts of financing terrorism as defined in of the Penal 18 U.S. Code § 2339A и § 2339B Code of United States.
  1. **18 U.S. Code § 2339A** — "Providing material support to terrorists"
  2. **18 U.S. Code § 2339B** — "Providing material support or resources to designated foreign terrorist organizations"
3. **International Sanctions** — refer to non-military measures decided by the European Union, the United Nations, another international organization, or the government of United States aimed at maintaining or restoring peace, preventing conflicts, restoring international security, supporting democracy, enforcing the rule of law and human rights, and achieving other objectives of common foreign and security policy.
4. **Compliance Officer (CO)** — the representative appointed by the Management Board responsible for the effective execution of the Rules, monitoring compliance with these Rules, and serving as the contact person for the Financial Intelligence Unit (FIU).

5. **FIU** — the Financial Intelligence Unit of the Police and Border Guard Board of United States.
6. **Business Relationship** — the relationship established in the economic and professional activities of the Company with a Client.
7. **Client (User)** — any natural or legal person who uses the services of the Company.
8. **Beneficial Owner** — a natural person who:
  - I. Exercises control over a transaction, operation, or another person through influence in whose interests or on whose behalf a transaction is performed;
  - II. Uses such influence to perform or control a transaction, act, operation, or step.
9. A person who holds the position of a senior managing official, if—after all possible means of identification have been exhausted—the individual cannot be identified and it is clear that such a person exists, or if there are doubts as to whether the identified person is the beneficial owner.
10. In the case of a trust, civil law partnership, community, or legal arrangement, the beneficial owner is the natural person who ultimately controls the association either through direct or indirect ownership or by other means. This includes the settlor, trustee, manager, or the beneficiary, or, where the beneficiary (or beneficiaries) has yet to be determined, the class of persons in whose main interest the association is set up or operates.
11. **Politically Exposed Person (PEP)** — a natural person entrusted with prominent public functions (e.g., head of state, head of government, minister, deputy, or assistant minister; member of parliament or similar legislative body; member of a governing body of a political party; member of a supreme court; or equivalent positions).
  - I. This definition also includes positions within the European Union and other international organizations.
  - II. A family member of a PEP is defined as the spouse (or equivalent), a child and their spouse (or equivalent), or a parent of the PEP.
  - III. A close associate of a PEP is a natural person known to be the beneficial owner or to have joint beneficial ownership of a legal person or arrangement, or who has close business relations with a PEP.
12. **Local Politically Exposed Person (local PEP)** — a natural person who performs or has performed prominent public functions in United States, a contracting state of the European Economic Area, or an institution of the European Union.
13. **Company** — PLEXICO IVESTMENT GROUP LLC, a company registered in 66 West Flagler Street, Miami, United States, Florida, registration number 33130.
14. **Management Board (MB)** — the management board of the Company. Each MB member, as appointed by the relevant MB decision, is responsible for the implementation of the Rules.

#### **AML COMPLIANCE OFFICER**

1. The Company has appointed a Compliance Officer ("CO") who is fully responsible for executing the Rules and reporting any material breaches of the internal AML policy, procedures, and applicable regulations, codes, and standards of good practice to the MB.
2. The AML Compliance Officer's responsibilities include:
  - I. Requesting appropriate identity documents to verify the identity of the Client and its representatives;
  - II. Requesting documents and information regarding the Client's activities and the legal origin of funds;
  - III. Requesting information about the Beneficial Owners of a legal person;
  - IV. Screening the risk profile of the Client, selecting the appropriate Customer Due Diligence (CDD) measures, and assessing the risk that the Client is or may become involved in money laundering or terrorist financing;
  - V. Re-identifying the Client or the Client's representative if any doubts arise regarding the accuracy of the information provided during initial identification.
3. For natural persons, the following data shall be recorded: full name of the Client.
4. Monitoring compliance with the Rules and ensuring that the Representatives' activities adhere to the established procedures.
5. Compiling and updating data regarding countries with various levels of money laundering and terrorist financing risks, and economic activities susceptible to such risks.
6. Conducting training and updating Representatives on procedures for preventing money laundering and terrorist financing.
7. Reporting to the MB at least annually (or more frequently, if necessary) on compliance with the Rules and any suspicions of money laundering or terrorist financing.
8. Collecting, processing, and analyzing data received from Representatives or Clients regarding suspicious or unusual activities.
9. Collaborating with and reporting to the FIU on any suspected money laundering or terrorist financing events and responding to FIU inquiries.
10. Proposing remedies to address any deficiencies identified during audits or reviews.

#### **CLIENT IDENTIFICATION**

1. The Company adheres to international standards for preventing illegal activities, notably Customer Due Diligence ("CDD"). CDD measures include:
  - I. Identifying the Client and verifying their identity using reliable, independent sources, documents, or data (including e-identification);
  - II. Identifying and verifying the Client's representative and the authority to represent;
  - III. Identifying the Client's Beneficial Owner;
  - IV. Conducting ongoing CDD to ensure the accuracy of the Company's knowledge of the Client and the source of funds;
  - V. Determining whether the Client is a PEP or related to a PEP.

2. To meet the CDD requirements, Representatives are entitled to request:
  - I. Information and documents verifying the right of representation, including the name of the document used, its date of issue, and the issuing authority (if such right does not arise directly from law);
  - II. Email address;
  - IV. Occupation.
3. If the Client is a legal person, the following data shall be recorded:
  - I. Name of the Client;
  - II. Registry code (or registration number and registration date);
  - III. Names and authorizations of the Management Board members, branch heads, or other relevant officials;
  - IV. Telecommunications numbers;
  - V. Email address;
  - VI. Phone number.
4. Upon receiving identification information, Company employees may verify its authenticity by requesting supporting documents from the Client.
5. For natural persons and their representatives, acceptable identification documents include:
  - I. Personal ID card (ID card, e-resident card, or residence permit card);
  - II. Passport or diplomatic passport;
  - III. Travel document issued by a foreign country;
  - IV. Driving licence (provided it includes the name, photo, signature, and either a personal code or date of birth).
6. For legal persons, their legal capacity shall be verified based on:
  - I. An extract from the commercial register for legal persons registered in United States or for branches of foreign companies registered in United States;
  - II. For foreign legal persons, an extract from the relevant register, a transcript of the registration certificate, or an equivalent document issued by a competent authority not older than six months;
  - III. Personal identification code (or, if absent, the date and place of birth and residence);
  - IV. Articles of association and memorandum;
  - V. Documents confirming the management and ownership structure.
7. Where applicable, the Client's representative shall submit a document certifying the right of representation in the required format.
8. Acceptable documents for verifying the Client's address include, but are not limited to:
  - I. A recent utility bill (e.g., landline, water, electricity) not older than 3 months;
  - II. A tax or tariff bill from the local government;
  - III. A bank statement (for a current account, deposit account, or credit card).
9. If the Company determines that a business relationship with the Client represents a high risk, it is entitled to request additional information regarding the source of the Client's funds or wealth.
10. When original documents are provided for identification, the Representative shall verify the data using at least two independent sources.

11. The Company may obtain additional information about the Client from third-party sources if it believes that the business relationship represents a high risk.
12. When verifying information about the Client's source of funds (including virtual currency or other assets), Company employees will request and analyze details regarding the Client's employment, business, or professional status.
13. Company employees have the right to request additional evidence of employment or occupation if deemed necessary, such as labor agreements, bank statements, or employer letters.
14. If doubts arise about the correctness of the information or documents provided, or if suspicious activity is detected, the Company may request that the Client undergo additional verification, including submission of high-definition photos of the Client with a note stating the date and the inscription "PLEXICO INVESTMENT GROUP LLC."
15. To use payment bank cards on the Company website (<https://plexico.io>), the Client may be required to undergo a special verification procedure in accordance with AML requirements.
16. The Company reserves the right to freeze the account of any Client if there is suspicion of involvement in money laundering. For example, if a USA citizen registers with false documents, the account will be deleted without refund.
17. After final confirmation of the Client's identity, the Company reserves the right to disclaim potential legal liability for any use of its services in criminal activities.
18. In line with practical standards for combating money laundering, the Company reserves the right to request additional documents or information necessary to verify the identity of a natural or legal person, or to verify transactions conducted by the Client.

#### **MONEY LAUNDERING MONITORING**

1. The Company reserves the right to conduct ongoing monitoring of its Clients, including regular reviews and updates of information regarding the Client's activities and risk levels if discrepancies arise.
2. The Company's AML monitoring program will periodically assess the adequacy of its systems and controls to prevent the use of the Company for financial crimes. The Compliance Officer shall report these assessments to the MB and governing body at least annually.
3. In compliance with legal requirements and for security reasons, the Company may limit services such as account opening and transaction processing for citizens, residents, or individuals located in countries where transactions are prohibited by international sanctions.
4. The Company applies International Sanctions as determined by the UN, EU, U.S., or relevant state bodies. Consequently, the Company will not engage in any actions that directly or indirectly evade financial sanctions. For clarity, the Company does not conduct business with Users from the following "Restricted Countries":

- Afghanistan
- Albania
- Barbados
- Belarus
- Botswana
- Burkina Faso
- Cambodia
- Cayman Islands
- Cuba
- Democratic People's Republic of Korea (DPRK)
- Donetsk and Luhansk regions of Ukraine
- Ghana
- Haiti
- Iran
- Iraq
- Jamaica
- Jordan
- Mali
- Mainland China
- Mauritius
- Morocco
- Myanmar
- Nicaragua
- Ontario (Canada)
- Pakistan
- Panama
- Philippines
- Quebec (Canada)
- Senegal
- Singapore
- Somalia
- South Sudan
- Sudan
- Syria
- The Bahamas
- Trinidad and Tobago
- Turkey
- Uganda
- United States
- Vanuatu
- Venezuela
- Yemen
- Zimbabwe

These geographic restrictions are applied in accordance with lists defined by relevant authorities and may be updated periodically.