

## **KYC POLICY (Valid from November 25, 2019)**

Having regard for the safety of the users and due to the legal requirements, The European Union, The United States of the America and other countries, Zinaem LLC has implemented and started to use KYC policy (customer's identification), AML / CTF (combating money laundering and terrorist financing) as it is required from banks and other financial institutions.

The purpose of those policies is an effective combating of money-laundering and terrorist financing (AML / CTF) on our exchange by proper identification of actual users of our accounts and supervision of their transactions. We shall identify and cease transactions made not only to purchase / sell cryptocurrency, but made mainly to hide criminal origin of money, finance illegal activity or other unlawful behaviours.

Specific provisions of our policies are confidential and for internal use only, in order to prevent their avoidance by dishonest or fraudulent users. We would like to introduce to you some of general rules and stipulations of our policies which directly concern you and affect our services we render.

### **USER'S IDENTIFICATION**

In the first place we are obliged to identify, beyond a reasonable doubt, identity of persons enabled to do transactions on our exchange. This is the reason why we collect ID scans, which authenticity is verified with special software of professional external providers.

We require sending "selfie" or your recording with ID document in order to preclude possibility of using your documents by someone else. Verification of your likeness to the photo from your ID is made with use of special software of professional external providers or, in case of doubts, done manually by our customer support services.

In case of any doubts our customer support team will contact you to explain any concerns and solve the issues that arose.

If we cannot determine, beyond a reasonable doubt, that the documents you provided belong to you and are the authentic we won't be able to let you to execute any transactions.

## **USER'S IDENTIFICATION – COMPANIES**

In case of all legal entities (companies), the procedure is more stringent and depends on company's structure, country, etc. Primarily, we need to establish who is the owner of the company, who can represent it, where the company is based and what is the business of the company.

Since standards regarding governmental documentation of legal entities is different in each country, every time the verification of such users are done "manually" and considerably more time consuming.

## **TRANSACTIONS' MONITORING AND SUPERVISION**

Using our proprietary software, we also analyse all transactions that take place on our exchange looking for suspicious and unusual behaviours. Such selected transactions are analysed by our AML specialists and evaluated if they do not provide significant AML / CTF risks or if they needed to be ceased and clarified with the User.

## **ADDITIONAL VERIFICATION**

When your trade volume rises, our AML / CTF verification duties increase as well. The same happens when your transactions are "flagged" as suspicious or unusual, or our verification of your person results in qualifying you as a person imposing significant AML / CT Frisk. In such a cases we can require additional documentation proving your real, exact place of residence, education, occupation, as well as the source of money you are using on the exchange.

Unfortunately, if our AML specialists decide information received from you don't clarify our doubts, we will oblige to end our cooperation with you or even report your transactions to relevant authorities.

## **BASICAM/CTFRULES**

Our operating rules include *inter alia* as follows:

1. Zinaem does not accept cash deposits or cash withdrawals in any cases.
2. Zinaem does not accept any third parties' deposits on user's account, managing the account on behalf of somebody, joint or shared accounts, etc.

3. Zinaem does not allow any exceptions in the field of documentation required from users.
4. Zinaem reserves the right to refuse to process the User's transaction at any time, in case of suspicion of AML / CTF risk.
5. In accordance with the international law we are not obliged (or even forbidden) to inform our clients, if we report their behaviours as suspicious to relevant authorities.

## **SANCTIONED COUNTRIES**

In accordance with our policies we do not open accounts and do not process transactions for citizens and residents of, as well as people staying in, countries where transactions are prohibited by international sanctions or their internal law regulations, or countries which based on various criteria selected by our AML team (for example Corruption Perceptions Index by Transparency International, FATF warnings, countries with weak anti-money laundering and terrorist financing regimes determined by European Commission) impose high AML /CTF high risk.

Currently these countries are:

Afghanistan, Angola, Azerbaijan, Bahamas, Botswana, Burundi, Cambodia, Cameroon, Central African Republic, Chad, Congo, Cuba, Democratic Republic of Congo, Equatorial Guinea, Eritrea, Ethiopia, Ghana, Guinea Bissau, Haiti, Iran, Iraq, Libya, Madagascar, Mozambique, Burma, Nicaragua, North Korea, Pakistan, Panama, Rwanda, Sierra Leone, Somalia, South Sudan, USA (some states), Sri Lanka, Sudan, Syria, Tajikistan, Trinidad and Tobago, Tunisia, Turkmenistan, Uzbekistan, Venezuela, Yemen, Zimbabwe, American Samoa, Guam, Nigeria, Puerto Rico, Samoa, Saudi Arabia, US Virgin Islands.

## **KYC VERIFICATION**

When your trade volume rise AML / CTF risk increases as well. That is why we have to introduce proper safety and verification duties. Currently our KYC / AML verification model is:

	<b>Level 1</b>	<b>Level 2</b>	<b>Level 3</b>
<b>Available deposit/withdrawal methods</b>	Cryptocurrency	Cryptocurrency and FIATs	Cryptocurrency and FIATs
<b>Deposit limits</b>	Unlimited	Unlimited	Unlimited

<b>Withdrawal limits</b>	To 1,000 USD daily To 20,000 USD monthly	To 5,000 USD daily To 100,000 USD monthly	Unlimited
<b>KYC</b>	ID verification	Utility bill	Source of funds
	Address data	Statement of account	Source of wealth
		AML	Video verification

You should remember that this model is a result of work and experience of our AML team and can be changed as legal requirements of countries changes as well as a result of gaining new knowledge and experience.