

Compliance with KYC and AML Policies

The concept of KYC (Know Your Client) is widely applied in banking and commercial practices, especially in relation to financial institutions and organizations involved in monetary transactions. It entails that such organizations must take measures to identify and verify their clients before engaging in financial transactions. This allows for the detection and prevention of potential cases of fraud, terrorism financing, and other illicit activities associated with monetary flows.

Open Finance company and its affiliated organizations adhere to AML (Anti-Money Laundering) and KYC strategies in order to counter and effectively prevent any actions that encourage illegal tax evasion, terrorism financing, and other criminal activities. Executives, employees, and subsidiary companies are obligated to adhere to these standards to prevent the company from being used for motives that facilitate illegal attempts to evade taxes. Consequently, Open Finance strives to comply with all applicable legislative requirements and regulatory norms to ensure the legality of its operations and prevent potential violations.

KYC and AML Policy

- 1) Prohibited Activities In accordance with our policy, we prohibit any activity aimed at concealing or altering the true origin of assets obtained through criminal methods in order to legitimize illegal proceeds.
- 2) Tax Evasion Tax evasion occurs in three stages. In the first stage, the "concealment" phase, income is transferred to financial structures where assets acquired through criminal activities are moved into various budgetary instruments such as wire transfers, checks, or cash funds. In the second stage, the "distribution" phase, reserves are moved to other accounts or financial institutions for additional asset cleansing from their criminal origin. In the third stage, the "reintegration" phase, money is returned to the economy and used to purchase property, businesses, or engage in criminal activities.
- 3) Every employee of the Company entrusted with duties related to client management must be familiar with important laws and guiding principles that define their professional responsibilities. They must diligently fulfill these obligations in accordance with applicable laws and directives.
- 4) The development of the company will be in accordance with the requirements of substantive law presented in the AML and KYC strategy.
- 5) The company commits to retain all official archives for the legally mandated period.

AML and KYC in the Company

- 1) Every employee of the Company involved in serving clients must be prepared to answer AML and KYC questions and undergo regular training periodically. They should also maintain their knowledge by participating in additional training programs. These measures are necessary to ensure compliance with the requirements of substantive law and to maintain a high professional standard for employees working with clients.
- 2) The Company welcomes its counterparts' commitment to complying with legislative requirements, including international standards aimed at combating illegal operations, falsification of budgetary data, tax evasion, and the legalization of illegally obtained funds.

- 3) The Company requires all counterparts to exclude their direct or indirect involvement in activities related to the illegal use of the website, as well as other unlawful actions.
- 4) The user undertakes to provide accurate information about their assets, confirm the lawful origin of funds, and use them only in accordance with the legislation. In the event of suspicious activities related to the use of questionable or counterfeit money, the Company reserves the right to investigate transactions suspected of fraud and suspend operations until the circumstances are clarified and an examination is conducted.
- 5) During the verification process, the Company has the right to request the client to provide copies of documents confirming their identity and bank cards used for deferred payment or other transactions, as well as reports confirming the lawful origin of assets.
- 6) The client is prohibited from using administrative and software resources for unlawful or false operations, as well as for tax evasion and other mandatory payments in accordance with the legislation of the country where the client or the company is located.
- 7) Refusal to engage in suspicious transactions does not imply the Company's intention to create any risks for the client or third parties due to the inability to fulfill obligations to the client.

To verify the client's compliance with all necessary requirements, including protection against fraud and extortion, Open Finance requests the provision of specific records in accordance with the principles of the international agreement "Know Your Client" (KYC). Our client verification process is straightforward and clear - it requires the submission of several records to complete the account verification.

To ensure the security of our company and its clients, we enforce strict rules for verifying the identity and residential address of each client wishing to use our services. Accordingly, we kindly request the following documents to be provided:

Identity Verification:

- 1) Please provide a copy of an identification document, such as a passport or driver's license. A high-quality photo or scanned copy of the front and back of the document is required.
- 2) If you are providing a passport, please scan the first two pages of the document.

Proof of Address:

- 1) Please provide a copy of your utility bill (photo or scanned copy of a bill for gas, electricity, phone, internet, etc.).
- 2) You may also provide a bank statement for a credit or debit card, dated no earlier than three months prior to the registration date on our website. It is important that the name on the statement matches the registered trading account holder.
- 3) When providing statements, please ensure they are unfolded. If you wish to conceal any data, please use a small piece of paper to cover the necessary area. It is important to guarantee the clarity and legibility of the image or scanned copy.

Bank Card Confirmation: To confirm your bank card, please provide a copy of the photo/scan of both sides of the card corresponding to your trading account.

Front side of the card: The image should display the first 6 and last 4 digits (e.g., 1111-11xx-xxxx-1111). To protect confidential data, the middle 6 digits should be covered with a small piece of paper.

Back side of the card: The image should display the cardholder's details, and the CVV code (a three-digit number on the back of the card) must be securely covered.

The image should be clear and legible to ensure a quality confirmation.

D.O.D (Deposit Declaration)

- 1) The client must sign the DOD and provide a photo or scanned copy of the completed declaration.
- 2) The images or scanned images must be clear and legible. Each client must undergo verification within 48 hours.
- 3) The images/scanned images must not be cropped, cut, darkened, or excessively brightened. All four corners of the records must be visible in the images/scanned images.
- 4) Duplicate records must be authentic.
- 5) The photos or scanned duplicates must be of high quality.
- 6) The following image formats are allowed: JPG, GIF, PNG, TIFF, or PDF.
- 7) The file size should not exceed 10 MB.
- 8) The photos or scanned duplicates must not be older than three months.
- 9) The documents must contain Latin characters or have a literal Latin interpretation.
- 10) In case of low-quality submitted documents, the verification department may require you to provide them again.

Usually, the confirmation process does not take much time; however, in some cases, it may take up to 24 hours. Our verification department will make every effort to conduct the verification and confirm the provided data in the shortest possible time. If you encounter any problems or have any questions, please contact our 24/7 customer support service.