



## AML AND KYC POLICY

This Policy is meant to provide the information that Getzcapital LLC. (further referred to as “Company”) strictly complies with all applicable laws and regulations of anti-money laundering (AML) and countering the financing of terrorism (CFT) policies. Thereby the Company carries out group of actions aimed at revealing criminally-obtained funds and their legalization countermeasures in correspondence with the international requirements.

### KNOW YOUR CUSTOMER AND DUE DILIGENCE

- According to AML and KYC policies, the Company identifies the Client and verifies his true identity by checking documents and data, at the moment of starting a business relationship with the Client and further on a regular basis.
- During the registration Client provides the Company with identification information, including but not limited to: Client’s full name, date of birth, country of residence, mobile number and email.
- After receiving identification information, the Company should verify the information requesting the appropriate documents:
  - The appropriate documents verifying the Client’s identity is a high resolution scanned copy or a photo of a passport or a driving license or any other national ID.
  - The appropriate documents verifying the Client’s address of residence is a high resolution photo of a utility bill or a bank statement.
- At the Company’s request the Client is required to provide a scanned copy or a photo of front and back side of the credit/debit card. The front side shows the cardholder’s full name, expiration date, first six and the last four digits of the card number. The back side shows the cardholder’s signature. CVC2/CVV2 code must be covered.
- The Company shall monitor the Client due diligence and accounts on a regular basis in order to determine the level of risk they pose and to reveal whatever changes in information about the Client.
- If the Company believes that business relationship with the Client may inflict a potentially high risk of money laundering or terrorism financing, Company is entitled to ask for whatever additional data and documents deemed necessary in the situation.
- The Client is obliged to inform immediately of any changes in the personal or contact information.

### DEPOSIT/WITHDRAWAL POLICY

- In order to minimize the risk of money laundering and terrorism financing the Company neither accepts nor pays off cash money under no circumstances.
- The Company reserves the right to refuse processing a transaction at any stage, if the Company believes the transaction may be in any way connected with money laundering or criminal activity.
- According to international legislation, the Company is prohibited from informing the Client that they have been reported to officials for suspicious account activity.
- Name of the person making a deposit of funds should be the same as the Client’s name in Company’s records. Payments from third parties are not accepted.
- Company requires strict adherence to established deposit/withdrawal procedure. Funds can be withdrawn to the same account and using the same method as when depositing. When withdrawing, a name of a payee should match Client’s name in the Company’s records. If the deposit has been made via wire, the funds should be withdrawn via the same method to the same bank account as when depositing. If the deposit has been made by means of a payment system, the funds can be withdrawn via online transfer to the same account as when depositing.
- The compliance with the AML policy requires withdrawal of funds to be made in the same currency as when depositing.



- The Company maintains transaction records for a minimum of 1 year after terminating the business relationship with the Client.

#### **PERSONNEL TRAINING**

- Employees who are dealing with clients or are involved in any AML checking, verification or monitoring undergo AML training. Each new employee has to follow an AML training plan.
- The AML training program includes suspicious transactions identification training as well as training in prevention, detection and reporting of money laundering and terrorism financing crimes.
- Any violation of the AML policy must be reported to the AML compliance officer, unless the violation implicates the AML Compliance Officer, in which case an employee must report the violation to the CEO.

#### **INTRODUCING CHANGES TO THE AML POLICY**

The Company reserves the right to review and/or amend the AML Policy, at its sole discretion, so please re-read it regularly. If the Client continues to use the website services or visits it, they agree automatically with changes introduced to the Policy.