

Integra Limited LLC

AML\KYC POLICY

Under the anti-money laundering/counter-terrorist financing (AML/CTF) Act, all financial institutions are required to collect, verify and store data identifying the account holder to help public authorities throughout the world to combat money laundering and terrorist financing.

Commonly, there are three stages of money laundering introducing laundered funds into the financial system.

1. Placement – cash funds, initially obtained through criminal acts, are transformed into traditional monetary instruments (money orders, traveler's checks, prepaid cards) or placed into accounts with financial institutions.
2. Layering – funds are then moved to other accounts and/or other financial institutions to further separate the money from its criminal origin.
3. Integration – after multiple transfers, funds are extracted back from the institutions and integrated into the economy (purchase of real estate, business financing, as well as terrorism financing).

In order to comply with international guidelines and regulations of anti-money laundering, Integra Limited LLC carries out a group of actions aimed at revealing criminally-obtained funds and their legalization countermeasures in correspondence with the international requirements, which are designed to accomplish the following tasks:

- Identify and counteract any attempts of money laundering and terrorism financing;
- Exclude the Company from participation (direct or indirect) in any acts contrary to applicable laws and regulations;
- Maintain and improve the Company's reputation on the worldwide arena by following the guidance of the Financial Action Task Force (FATF);
- Raise the level of public confidence in the FinTech sector;
- Improve the Company's compliance methodology to prevent the usage of Services in money laundering and terrorism financing activities.

In accordance with aforementioned policies, the Company identifies and verifies the Client's identity at the moment of account creation through a mandatory "Know

Your Customer” procedure. Before creating an account, every Client is obliged to accept and comply with the following rules:

- Comply with the Governing Law and Local Law on counteraction of legalization of proceeds from crime, including but not limited to the AML/CTF Act, as well as other optionally applicable rules and regulations;
- Immediately provide any information that the Company deems necessary to request for compliance with applicable laws and regulatory requirements in respect of combating the legalization of funds obtained by illegal means;
- Guarantee to the Company that the funds used to refill the account in the past, present or future have been obtained from legitimate sources and have no relation to the legalization of income obtained by illegal means or to any other illegal activity prohibited by applicable law or regulations of any international organizations;
- Guarantees to the Company that any funds received from Services will not be used to finance any illegal activity.

During account registration Client provides the Company with identification information, including but not limited to:

- Personal Identification Info (full name, email, phone number, postal addresses, government ID info);
- Proof-of-Address (bank statements, utility bills, postal slips).

The Company shall further monitor the Client’s due diligence and account on a regular basis in order to determine the level of risk they pose and to reveal whatever changes in information about the Client. In carrying out the aforesaid verifications, the Company has the right to demand other information and copies of other documents, including in notarized form or otherwise in accordance with applicable law. The Client is obliged to inform immediately of any changes in personal or contact information.

In order to minimize the risk of money laundering and terrorism financing, the Company will neither accept nor pay off any 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.

The Company does not provide Services to residents of the Restricted Territories, or high risk countries, as deemed by the Financial Action Task Force (FATF). The Company does not register the aforesaid customers and does not accept funds from them.

The Company reserves the right to block an account at any time, if the Company believes that activity at this account might be connected with money laundering or criminal activity. The Company is obliged to unblock the account in case such activity was not registered. According to international legislation, the Company is prohibited from informing the Client that they have been reported to officials for suspicious account activity.