

AML/KYC Policy

BCS Ecosystem Limited, a legal entity duly registered in Ile Du Port, House of Francis, room 303, Mahe, Seychelles with No. 238747 (hereinafter the “Company”) follows the requirements set out in the Seychelles Anti-money Laundering Regulations, Consolidated by the Financial Services Authority (AML regulations), and the guidelines on the characteristics of suspicious transactions possibly involving money laundering and terrorist financing.

1. General provisions

- These Policy of procedure for prevention of money laundering and terrorist financing, and compliance with international sanctions lay down requirements for screening the Clients in order to prevent entering into deals involving suspected money laundering and terrorist financing, and to ensure identification and reporting of such in case of existence of a risk determined by the Company. These AML/KYC Policy shall be applied in case of any issue related with money or financial transaction(s) is occurred.
- The rules are primarily based on the regulations of AML/KYC legislation applicable and international sanctions acts.

2. Application of due diligence measures

- The Company shall determine and take due diligence measures using results of conducted international risk assessment and provisions of national risk assessment.
- Depending on the level of the risk of the Client and depending on the fact whether the business relationship is an existing one or it is about to be established, the Company shall apply either normal KYC/AML measures, simplified KYC/AML measures or enhanced KYC/AML measures. The Company may also apply continuous KYC/AML measures to ensure ongoing monitoring of business relationships.
- KYC/AML measures may include, but are not limited with, the following procedures:
 - Identifying the Client and verifying its identity using reliable, independent sources, documents or data, including e-identifying;
 - Assessing and, as appropriate, obtaining information on the purpose of the business relationship;
 - Conducting ongoing KYC/AML on the Client's business to ensure the Company's knowledge of the Client and its source of funds is correct;
 - Obtaining information whether the Client is a PEP or PEP's family member or PEP's close associate;
 - Obtaining information from any third party, e.g. government authorities.
- The Company may establish the source of wealth of the Client, where appropriate.

- To comply with the KYC/AML obligation, the Company or any third party appointed by the Company shall have the right and obligation to:
 - request appropriate identity documents to identify the Client;
 - request documents and information regarding the activities of the Client and legal origin of funds;
 - screen the risk profile of the Client, select the appropriate KYC/AML measures, assess the risk whether the Client is or may become involved in money laundering or terrorist financing;
 - re-identify the Client, if there are any doubts regarding the correctness of the information received in the course of initial identification.
- The objective of the continuously applied KYC/AML measures is to ensure on-going monitoring of Clients. Conducting ongoing monitoring of the Business Relationship includes:
 - Keeping up-to-date the documents, data or information, obtained during taking KYC/AML measures;
 - Paying particular attention to Client's actions, leading to criminal activity or money laundering or terrorist financing;
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- The Company evaluates the substance and the purpose of the Client's activities, in order to establish the possible links with money laundering or terrorist financing. The evaluation should result in an understanding of the purpose of the business relationship for the Client, the nature of the Client's business, the risk levels of the Client and, if necessary, the sources of funds.

3. Identification of a person

- Upon implementing KYC/AML measures the following person may be identified upon the Company's sole discretion:
 - Client – a natural person;
 - PEP – if the PEP is the Client or a person connected with the Client;
 - Source of wealth and source of funds;
- Documents that can be used for identification
 - In case of Clients being natural persons, the following documents can be used for identification:
 - Personal ID card (whether ID card, e-resident card or residence permit card with photo);

- Passport.

4. Risk assessment and action steps

- The Company applies the following risk categories:
 - Low risk;
 - Medium Risk
 - High risk.
- The Company is entitled to apply any combination of AML/KYC procedures based on a risk category of a Client and on a risk-based approach to each Client of the Company.
- In accordance with the applicable laws and the requirements of international organizations, the Company may, where appropriate and without the obligation of obtaining the Client's approval or notifying the Client, notify regulating and/or law enforcement agencies of any suspicious transactions.
- The Company shall periodically refer to and consult the lists published by the local authorities and international organizations that contain lists of known terrorists or persons suspected of terrorist activities, terrorist organizations, high-risk countries, a limited list of countries subject to the OFAC, UN and other sanctions lists, jurisdictions that do not provide sufficient level of anti-money laundering procedures, as well as countries subject to sanctions to determine whether the Company's Client, and/or such Client's country of jurisdiction is included in the above lists.

5. Client's covenants

- The Client hereby certifies that they have read and understood this Policy, and the Client shall operate in full compliance with the requirements and standards outlined in the Policy and comply with all applicable laws and other regulations and requirements governing its activities as a Client of the Company.
- The Client acknowledges that they are responsible for their actions in accordance with the effective laws in the field discussed in this Policy and shall bear responsibility pertaining to failure to comply with such laws.