

## **Know Your Customer (KYC) and Anti-Money Laundering (AML) Policy and Procedures**

It is the policy of Inlock Services UAB, Laisvės pr. 60, Vilnius, code: 306036522 the Service Provider of the [www.inlock.io](http://www.inlock.io) platform, hereinafter referred to as the “Service Provider” to prohibit and prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by complying with all applicable legal requirements of the EU.

### 1. The objective of the AML Policy

The Service Provider is under the obligation to apply anti-money laundering (AML) requirements in our business. All our staff are committed to pursuing the highest standards of AML and Know Your Customer (KYC) compliance to mitigate the risk of our services being used to facilitate financial crimes.

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the proceeds appear to have derived from legitimate origins or constitute legitimate assets. Terrorist financing may not involve proceeds of criminal conduct but is rather an attempt to conceal either the origin of the funds or their intended use.

We have implemented the framework of AML Policy in order to ensure that all the necessary steps are taken to achieve the full safety of our services. In this AML Policy, we are committed to following the provisions specified in the Lithuanian AML Laws, EU and International AML guidelines.

### 2. What is AML Policy?

AML Policy is the procedure to prevent our services from being used for the purpose of money laundering, terrorist financing or any other criminal activity. KYC measures are part of the AML Policy. The objective of KYC measures is to enable businesses to know and understand their customers better and help them manage their risk. We may update such a procedure in the future to assure compliance with the existing laws and best AML practices.

To these ends:

- The identities of all new and existing clients will be verified to a reasonable level of certainty.
- A risk-based approach will be taken to the onboarding and ongoing monitoring of clients including enhanced due diligence for those customers presenting high risk.
- Transactions monitoring of the customer financial behavior based on a risk-based analysis.
- Any suspicious activity will be reported to the relevant law enforcement authorities, and all AML activities recorded.

- Dr. Kata Stier will act as the Money Laundering Reporting Officer (MLRO) to coordinate the AML policies and procedures of the business.
- All staff that meet or contact clients and potential clients of the company are required to acknowledge that the policy and procedures have been read and understood before meeting or contacting clients—Periodical AML training for our staff.
- All customer and transactional information are stored confidentially and according to personal data protection laws.

We are obliged to reject the customer's documents, close accounts and terminate the business relationships if we find any suspicious activity, false documents or non-cooperation by the customer within the customer due diligence procedure.

### 3. Customer Due Diligence

The company has established a Know-Your-Customer (KYC) Policy to ensure that the identities of all new and existing clients are *identified* and *verified* to a reasonable level of certainty.

*Identification* is the process of obtaining personal details and other relevant information on the client. The information obtained on natural persons (individual) and legal persons (such as in the case of companies, partnerships etc.) would vary accordingly.

*Verification* takes place by making reference to documents, data or information obtained by the applicant for business.

The following information may be presented by the **individual for identification**:

- Official Full Name (with First Name and Last Name separation)
- Nationality
- Permanent Residential Address (country, city, zip code, street, house number)
- Telephone Number
- Email address
- Place and Date of Birth

The following documents of evidence would be necessary for the **individual verification**:

- Either a valid, unexpired passport, driver's license, or government-issued document featuring a matching photograph of the individual and a full name and date of birth matching those provided.

- An original recent (not older than 3 months) utility bill, bank statement or government-issued document with the same address matching those provided by the individual. NO MOBILE PHONE BILLS ARE ACCEPTED!

The client can provide a utility bill, bank statement or any other document received through electronic means or downloaded electronically as long as he/she can prove that the document has been received electronically. For example, the URL is usually displayed at the bottom of the page in case of downloaded bills or bank statements.

All the documents shall be written by Latin characters. Inlock staff will check and review any uploaded documents within 48 hours.

The following information may be presented by **the legal person for identification**:

- Official full name of the legal person
- Registration number or Tax Identification Number
- Date of incorporation or registration
- Registered address or principal place of business

The following information may be presented by **the legal person for verification**:

- A certified true copy of the certificate of incorporation
- A certified true copy of the Memorandum and Articles of Association
- A certified true copy of a recent trade register extract or similar document
- Company search confirming that the company is not dissolved, struck off, wound up or terminated. Where this is not possible, the certificate of good standing and incumbency shall be obtained
- Identification of directors: full name, place and date of birth, residential address, ID number/passport, nationality
- Proof of identity and proof of address (see above) of persons vested with legal and judicial representation;
- Proof of identity and proof of address (see above) of ultimate beneficial owners owing 25% or more of the legal entity
- Corporate structure chart showing ownership
- Description of nature of business (source of wealth)

Latin characters shall write all the documents. The statements and trade registration shall be in English or Hungarian language or a certified translation is required. The Inlock staff will check and review any uploaded documents within 48 hours.

For further information, please contact [support@inlock.io](mailto:support@inlock.io)

**Last revision: 03/06/2022 – INLOCK UAB**