

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

It is the policy of Income Locker OÜ: registered seat: Harju maakond, Tallinn, Kesklinna linnaosa, Ahtri tänav-12-200, 10151, Estonia, Company Registered Number: 14486259, developers and owners of the www.inlock.io platform, hereinafter referred to as the “Company” 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 EU.

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.

Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terrorist operations can be the same as or similar to methods used by other criminals to launder funds. Funding for terrorist attacks does not always require large sums of money and the associated transactions may not be complex.

Our AML policies, procedures and internal controls are designed to ensure compliance with all applicable regulations, rules and laws and will be reviewed and updated on a regular basis to ensure appropriate policies, procedures and internal controls are in place to account for both changes in regulations and changes in our business.

The Company operates in compliance with ‘anti-money laundering (“AML”) and ‘know your customer’ (“KYC”) rules and regulations in the jurisdictions it operates in or sells products or services to and has developed the given KYC and AML Policy to protect itself from involvement in money laundering or suspicious activity as follows:

- The Company is performing an enterprise-wide risk assessment to determine the risk profile of the Company.
- The Company has established KYC and AML policies and procedures that have been reviewed and approved by the Company’s Board of Directors (the “Board”).
- The Company is implementing internal controls throughout its operations designed to reduce risks of money laundering, including designating a person responsible for AML compliance.
- The Company performs know your customer (“KYC”) procedures on all token sale purchasers.

KYC and AML data POLICIES AND PROCEDURES

I. Purchaser Identification

Inlock’s website collects additional identifying information on each purchaser in its token sale with Regulatory guidelines and to comply with anti money laundering (AML) or “know-your-customer” (KYC) policies.

1.1 Individuals

- Full Name (with First name and Last name separation)
- Residential Address
- Telephone No.
- Email address

- Date of birth,
- Nationality,
- ERC20 compatible Ethereum Wallet Address for token purchase

Following copied evidences would be necessary for Proof of ID and Proof of Residence:

- Passport or ID or driver license (front and back)
- Utility or telephone bills;
- Bank statement
- Other type of proof of residence document

1.2. Companies

- Company Name
- Company Address
- Government-issued business registration number or tax identification number
- Copy of a recent trade register extract or similar document
- Authorized Representative, compare Individual of KYC process
- Confirmation of source of funds
- Sworn statements or Affidavits
- ERC20 compatible Ethereum Wallet Address for token purchase

I. Contributor Eligibility

Even after KYC approval the Company can do additional checks and ask for further documents.

The Company shall not accept purchasers (individuals or entities) who are not at least eighteen (18) years of age or purchasers from the following jurisdictions (the "Prohibited Purchasers"):

- United States - Individuals or entities from or residing in the United States, including American Samoa, Guam, Northern Mariana Islands, Puerto Rico, U.S. Virgin Islands, or any entity organized or incorporated under the laws of the United States. U.S. citizens living abroad may also be deemed "U.S. People" under certain rules.
- Following countries' residents also not accepted because of their local regulation: Bolivia, Ecuador, Pakistan, Iran, Algeria, Morocco, People's Republic of China (however, Hong Kong, Macau and Taiwan are fine and not considered part of China for these purposes), North-Korea, Libya, Cuba

The Company explicitly prohibits the Prohibited Purchasers in its Token Sale Terms and Conditions (the "T&C"). Any purchasers that purchase tokens in violation of the T&C shall be deemed invalid and such purchasers shall have their purchase amount returned to them at their expense.

The information and documents may be sought in printed form or through email or online submission or any other mode as deemed fit by the Company.

II. Our KYC identification process is the following:

- Our customer or token buyer reaches the prototype lending page (mvp-demo.inlock.io) and start to register
- Customer declares that he/she is not a resident of USA, Iran, North-Korea, etc. countries

- Customer identifies their personal information (including full name, birth date, residence)
- Customer has to upload evidences about proof of ID and proof of residence
- For better validation we use the following *apilayer* services: *numverify* API (phone number validator), *mailboxlayer* API (email validator), *vatlayer* API (vat number validator), *streetlayer* API (location validator)
- After a successful KYC identification, a unique KYC ID is generated and linked to the existing user profile.
- Any cryptocurrency related activities on the platform is linked to user ID and KYC ID as well. Any kind of fraudulent activities are exactly linked to an identified customer.

III. Dispositions of AML Flags

- Global Sanctions List - If the flag is a match on the Global Sanctions List, the Company shall deny the purchaser and let them know of the disposition of the review.
- PEPs - If the flag is a match on PEPs, the Company's council shall review the AML report and may request proof of identification or additional verification from the prospective purchaser.
- After receiving any additional verification information, the Company shall provide the prospective purchaser with notice of disposition.
- Adverse Media - If the flag is a match on Adverse Media, the Company's council shall review the adverse media and make a determination on whether to allow the prospective purchaser.

IV. Appointment of an AML Compliance Person - Designation and Duties

The Company is in the process of designating a compliance person to be its Anti-Money Laundering Program Compliance Person (AML Compliance Person), with full responsibility for the Company's AML program. The duties of the AML Compliance Person will include monitoring the Company's compliance with AML obligations, overseeing communication and training for employees.

The AML Compliance Person will also ensure that the Company keeps and maintains all of the required AML records and will ensure that suspicious activity reports are filed. The AML Compliance Person is vested with full responsibility and authority to enforce the Company's AML program.