

AML, CFT & Sanctions Policy

WhalebONE Ltd. (hereinafter "we" or "our") has developed an Anti-Money Laundering and Terrorist Financing Policy ("AML/CTF Policy") for the exchange of digital virtual currencies, in order to comply with domestic and international laws and regulations related to anti-money laundering in all countries, in which we operate. The Policy includes the following provisions:

Development of reliable internal policies, procedures and controls that counter attempts to use **WhalebONE Ltd.** for illegal or unlawful purposes, and which are designed to ensure our customers:

- Basic protection in accordance with consumer protection laws;
- Maintaining comprehensive accounting of orders and transactions;
- Performing Know-your-Customer ("KYC") procedures for all clients;
- Conducting regular independent audits of our "AML/CTF Policy";
- Secure storage of data without access to it by third parties;

WhalebONE Ltd. provides for the implementation of an official and permanent training and professional development program for all new and existing employees.

Our AML/CTF program has been reviewed and approved by our Board of Directors (the "Board"). Our AML/CTF program is regularly reviewed and, if necessary, reviewed to comply with applicable rules, regulations and policies. Changes can be made without prior notice to customers.

WhalebONE Ltd. has developed robust internal policies, procedures, and controls that comply with domestic and international laws and regulations on AML/CTF, as well as other reporting requirements.

All our employees and officials undergo continuous extensive training in the field of AML/CTF, as well as specialized training. Professional development takes place at least once every twelve (12) months. This ensures that staff and officials are aware of and comply with all relevant laws and regulations.

New employees are trained within thirty (30) days from the date of employment. All documentation related to AML/CTF policy compliance training, including materials, tests, results, attendance, and date of completion, is maintained in accordance with the requirements of archival legislation. In addition, our AML/CTF compliance training program is updated as needed, taking into account current and new domestic laws, international agreements, and regulations.

Our AML/CTF compliance team is responsible for developing and enforcing the policies and procedures of our AML/CTF Program.

The KYC procedure is an important part of our AML/CTF program and helps us identify suspicious activity in a timely manner and prevent fraud.

To open an account and use the services of **WhalebONE Ltd.**, your identity must be authenticated and verified for compliance with government checklists. Failure to follow any of these steps will result in the inability to use **WhalebONE Ltd.**

Before opening an account for an individual client, we collect, verify and authenticate the following information:

- Email address;
- Mobile phone number;
- Real name, patronymic and surname;
- Taxpayer identification number;
- Date of birth;
- Citizenship;
- Identification card (for example, driver's license, passport);
- Home address (not a mailing address or mailbox).

Additional information or documentation is at the discretion of our AML/CTF compliance team, such as utility bills or bank statements.

If you successfully comply with the KYC requirements and will not be on the list of government organizations, we will provide you with an agreement on cooperation in electronic form.

In order for a corporate client to open an account with a legal entity, we collect, verify and confirm the authenticity of the following information:

- The legal name of the company;
- Registered company number;
- Full legal name (including all beneficial owners);
- Email address (including all beneficial owners);
- Mobile phone number (including all beneficial owners);
- Address (main place of business and/or other physical location);
- Proof of legitimate business activity (for example, government-certified constituent documents or a certificate of education, a business license issued by government authorities, a trust instrument, or other comparable legal documents, if applicable);
- Contact information of the owners, principals and executive management (if applicable);
- Proof of identity (for example, a driver's license, passport, or identity card issued by government authorities) for each individual beneficial owner who owns 25% or more of the company's shares, as well as for all account signatories;
- Identification of information for each beneficiary who owns 25% or more of the company's shares.

If your organization successfully passes the verification for compliance with our KYC requirements, and neither it nor its owners, directors, managers or managers are marked in the lists of government organizations, we will provide you with account opening agreements in electronic form.

Suspicious activity/Regulation of currency transactions

We may block or suspend your account, as well as notify the appropriate authorities if we learn or have reason to believe that you are using **Whalebone Ltd.** for suspicious activities.

A suspicious transaction is often one that is incompatible with the known and legitimate business, personal actions, or personal funds of the client.

We use our AML/CTF compliance department, which monitors transactions to help identify unusual patterns of customer activity. Our AML/CTF compliance team checks and investigates suspicious

activities, as well as collects information on the basis of which we decide on preventive actions towards the client.

Data accounting

All identification data is stored for five (5) years and is available upon an official request from an authorized expert, regulator, or law enforcement agency.