

# **POLICY**

## **Of the website Denistiaglin.com - AML (Anti-Money Laundering) & KYC (Know Your Customer)**

The aim of the Anti-Money Laundering and Know Your Customer policy (AML & KYC Policy) is to prevent money laundering and terrorist financing activities on the Website by complying with international and domestic legislation and implementing user identification procedures.

The words “Denistiaglin.com”, “Company”, “Website Administration” refer to Limited Liability Company “WETER INVESTMENT” (hereinafter referred to as the Company) established and registered in 2021 at the territory of the United Arab Emirates (hereinafter referred to as the UAE). Company address: PO Box No. 0, Dubai, United Arab Emirates. Depending on the context, “Denistiaglin.com” may also refer to the subject matter of any transactions (agreements), website, content or other materials provided by the Denistiaglin.com Website.

AML & KYC policy is an integral part of the User Agreement, by accepting which, the User automatically agrees with the AML & KYC policy. All terms specified in this AML & KYC Policy with a capital letter and not otherwise defined have the same meanings as in the User Agreement.

### **Definitions**

**1.1.** Capitalized terms in this AML & KYC Policy have the following meaning:

- 1.1.1.** Money laundering is attributing a legal form to the possession, use or disposal of money or other property obtained as a result of a crime, that is, their transfer from the shadow, informal economy to the official economy in order to be able to use these funds openly and publicly. Official documents call money laundering “legalization (laundering) of money or other property obtained by criminal means”.
- 1.1.2.** Financing of terrorism is the provision or collection of funds by any means, directly or indirectly, with the intent to use them or on the condition that they will be used in whole or in part to carry out any of the crimes related to terrorism.
- 1.1.3.** User identification is the process of recognizing a user by his identifier.
- 1.1.4.** Authentication is an authentication procedure, proof that the user is exactly who he claims to be.
- 1.1.5.** A user is a person who has an Account on the website (personal account)/ When acquiring Participation Shares in projects, the User is a Participant.

### **General Provisions**

**1.2.** The Company must comply with the requirements contained in domestic and

international laws on the prevention of Money Laundering and Terrorist Financing, as well as the requirements of other laws and regulations, to the extent that they are related to the activities of the Company, including, but not limited to, the following methods:

- 1.2.1. collection of information about Users;
- 1.2.2. creating and updating internal policies and procedures required by applicable law;
- 1.2.3. monitoring transactions and investigating any significant deviations from normal activities;
- 1.2.4. providing law enforcement agencies with the information required in accordance with applicable law.
- 1.2.5. The company distributing the AML & KYC Policy may make changes and amendments to it at its discretion and will monitor compliance with its provisions and requirements. The company reserves the right:
- 1.2.6. to request from the Client any additional information and documents in case of suspicious transactions;
- 1.2.7. to suspend or terminate the operation of the User's trading account if the Company has reason to believe that the User is involved in illegal activities.
- 1.2.8. The current version of the Policy is always available on the website at: <https://denistiaglin.com/aml-kyc-policy/en.html>.

### **Verification policy**

- 1.3. AML & KYC policy includes a client verification procedure, monitoring of his operations, as well as an assessment of possible risks.
- 1.4. The client verification procedure includes personal identification, for which the Company requires the submission of documents, data or information (for example, a national ID card and an international passport).
- 1.5. The Company reserves the right to verify the identity of the Client on an ongoing basis, especially when his identification information has been changed or his activity is suspicious.
- 1.6. The Company reserves the right to request the User for up-to-date documents, even if they have been verified earlier.

### **“Know Your Customer” verification procedures**

- 1.7. The Company conducts “Know Your Customer” (KYC) verification procedures to avoid the risk of prosecution and to protect itself from Customer's attempts to use the Company for illegal actions.
- 1.8. As part of the KYC procedures, the Company evaluates the transactions of the Clients, as well as collects and stores information on material facts concerning the Clients,

potential Clients and their transactions.

- 1.9. After carrying out the identification procedures related to the Client, the Company saves the information received in the file of this Client.
- 1.10. The Company is obliged to complete the identification procedures related to the Client once.
- 1.11. The Company strives to protect the rights of the Clients and the confidentiality of their personal data. The Company collects personal information from Clients only to the extent necessary to ensure the proper provision of services to the Clients. Such personal information about Clients and former Clients can be transferred to third parties only under certain circumstances in accordance with the legislation and agreements between the Company and the Client.

The Company must ensure the safety of the Client's files, including statements, transaction reports, receipts, notes, internal correspondence and any other information (documents) associated with the Client in electronic format during the entire time of its activity.

- 1.12. The Company has the right to suspend the Account if the Website Administration has reason to believe that it is associated with suspicious activity, and ask the owner of such an Account to pass the KYC procedure.

### **Identification and detection of suspicious activities**

- 1.13. Any financial transaction that may be related to money laundering is considered suspicious.
- 1.14. The basis for determining that a particular transaction is suspicious may be personal observations and experience of the Company's employees, as well as the information received (including the information about personal data).
- 1.15. In accordance with applicable laws and requirements of international organizations, the Company has the right to notify regulatory and (or) law enforcement agencies about any suspicious transactions without notifying the Client.
- 1.16. The Company should periodically check the lists published by local authorities and international organizations, which contain the names of known terrorists or suspected terrorists, names of terrorist organizations, high-risk countries, countries subject to OFAC (Office of Foreign Assets Control), countries that are subject to other sanctions, as well as countries that do not provide a sufficient level of anti-money laundering procedures to determine whether the Client of the Company or a potential Client and (or) the country of such a Client is included in the above lists.
- 1.17. The Company must constantly conduct due diligence procedures with respect to its Clients and carefully check the transactions they conduct to ensure that the Company is aware of its Clients, their business and, if necessary, their sources of income.

### **Amendments and Changes**

- 1.18. This KYC Policy may be changed or supplemented at any time at the sole discretion of Website Administration of Denistiaglin.com. The User acknowledges and agrees that he is responsible for periodically checking the KYC Policy and familiarizing

himself with the changes and supplementations.

- 1.19.** If the User does not want to accept the amended and (or) supplemented KYC Policy, he should not continue to use this Website. Further use of the Website by the User after the publication of changes to the KYC Policy will be considered as his acceptance of these changes.