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## Anti-Money Laundering

Investing Crypto is committed to high standards within financial crime compliance. It is a priority across the entire Group to stay focused on the risks, prevent regulation breaches and avoid facilitating clients or transactions involved in financial crime.

The Board of Directors sets fundamental financial crime standards across the Investing Crypto in the Group AML Policy and in the Group Risk Appetite Statement.

The Group's organisational setup covers three lines of defence. To be confident that the Investing Crypto complies with AML regulations, the Group adheres to the three lines of defence governance model.

The three lines of defence model ensures effective risk management and creates a clear division of responsibilities between the different functions within the Group.

**First line of defence:** The different business entities have the primary responsibility in establishing, complying with and enforcing measures to reduce the Group's risk of money laundering and terrorist financing.

**Second line of defence:** The compliance functions control and assess the adequacy and effectiveness of the measures and procedures put in place to comply with rules and regulations, as well as the actions taken to address any deficiencies in Investing Crypto's compliance.

**Third line of defence:** Independently, Internal Audit evaluates whether the measures are adequate and that they work as intended.

Findings and recommendations from Compliance and Internal Audit must be prioritised and handled within a reasonable timeframe.

When we onboard clients, we are required to ask questions and collect documentation before opening their account in accordance with KYC policies (Know Your Client). From this, we can build an accurate picture of our client's identity and understand how they intend to use our services. This is an important aspect in combatting financial crime which is in the clients', society's and Investing Crypto's best interest.

We ask a wide range of questions, covering employment, salary and the clients' source of wealth. We are also required to update and confirm our information on an ongoing basis. The more we know about our clients and their usual behaviour, the faster we can react if something looks odd or wrong.

The Group has also implemented a monitoring system, which detects unusual or suspicious transactions. All generated alerts are investigated and if the suspicion cannot be dismissed, the client is reported to the FIU following regulatory requirements.

Clients and transactions are screened against relevant lists such as sanctions lists.

### **Anti Bribery and Corruption**

It is a priority for the Investing Crypto to exercise all due efforts to ensure that corruption does not occur in its business activities. Investing Crypto's commitment to fair dealing is embedded in its Anti-Bribery and Corruption Policy. Upholding high standards of openness, integrity and accountability, the Board of Directors ensures a zero-tolerance approach to corruption.

All employees, including business partners and intermediaries, (including White Label Clients, Introducing Brokers, and Referring Agents) have a responsibility to avoid any involvement in corrupt practices.

The policy emphasizes individual responsibility. Individuals are prohibited from directly or indirectly offering or accepting benefits or rewards for engaging in improper activities to gain an advantage. All employees also have a responsibility to report concerns or suspicion of bribery and corruption to local Compliance teams or through the Whistleblowing system. All employees receive Anti-Bribery and Corruption training.

To monitor effectiveness, the Investing Crypto has appointed an Anti-Bribery and Corruption Officer, who, along with Group Compliance assesses relevant procedures periodically through risk-based monitoring.