

# HIMALAYA EXCHANGE ANTI-MONEY LAUNDERING AND COUNTER TERRORISM FINANCING POLICY (AML/CTF) POLICY

Thank you for choosing the Himalaya Exchange. Your use of the Himalaya Exchange's products and services is subject to this Anti-Money Laundering and Counter Terrorism Financing Policy (the "**Policy**").

## 1. Introduction

This Policy sets forth the rules and procedures that the Himalaya Exchange group of companies incorporated under the laws of the British Virgin Islands, its subsidiaries and affiliated parties (the "**Exchange**") follow for detecting and preventing any financial crime.

This Policy is an integral part of the Exchange's Terms of Conditions, which are at all times available on the Exchange's website. The Exchange is strongly committed to preventing the use of its products and services for money laundering or any activity which facilitates money laundering, the funding of terrorist or criminal activities, or any other illicit purposes.

## 2. Protection Measures

The Exchange has implemented protection measures, which protect the Exchange from being involved and the Exchange's Members from carrying out any suspicious financial activity, by:

- 1) Performing Know Your Customer (KYC) Procedures on Members. We follow our internal procedures to identify and verify our customers before a business relationship is established. We will require your personal information for customer due diligence purposes to the extent we deem necessary. This may include but not limited to a copy of your ID document, a proof of address and contact details. We may obtain this information directly from you or, where applicable, from a reliable and independent source such as a public database. More information on how we handle your personal data can be found in our Privacy Policy which you can find on the Exchange's website. The extent of customer due diligence measures may vary depending on the Exchange providing the Services to you as well as your overall risk-profile. We may decide at our sole discretion which customers we consider high risk and what our risk appetite towards such customers is. We may decide to conduct enhanced customer due diligence which comprises, amongst other things, obtaining additional information such as information about the source of funds and wealth.
- 2) Monitoring and Ongoing Customer Due Diligence. We undertake continuous monitoring of your transactions and overall behaviour while using our products and services. We also put the best efforts to ensure that your information is up to date, so we may request to occasionally update your personal data during the course of our business relationship. We also may take an appropriate action such as suspending your account or transaction for further investigation if we deem it necessary in order to protect you and the Exchange from any potential illegal activity.
- 3) Performing Risk Assessments to Determine the Risk Profile of the Exchange. We establish and maintain a risk based approach towards assessing and managing the money laundering and terrorist financing risks to the company. Establishing and maintaining risk-based customer due diligence, identification, verification and (KYC) procedures, including enhanced due diligence for those customers presenting higher risk, such as Politically Exposed Persons (PEPs).
- 4) Reporting Suspicious Transactions to the Relevant Financial Authority. We put our best efforts to protect you and the Exchange from any illegal activity, so we take all necessary measures to ensure that any suspicious activity is identified, duly assessed and reported to the responsible authorities, if necessary. If we suspect that your property of any value is, directly or indirectly, derived from a criminal act or from involvement in such an act, or if we know or suspect that your transaction is used to support illicit activity, we will report it to the respective Financial Investigation Agency (FIA). We may also be required to provide your personal data to other authorized institutions responsible for the prevention of money laundering and terrorist financing, law enforcement agencies and/or tax authorities.

- 5) Implementing internal procedures, policies, and controls aimed at mitigating risks of money laundering and terrorist financing.
- 6) Conducting AML/CTF training and awareness for all staff.
- 7) Conducting periodic AML testing and audits.

**3. Jurisdictions the Exchange does not provide services:**

Afghanistan, Democratic People's Republic of Korea (DPRK), Iran, Iraq, Pakistan, Syria, Somalia, Nigeria, USA, Canada, Japan.

We put a lot of effort to fully comply with the applicable legislation, our internal rules as well as to provide you with the best experience when using our products and services. Accordingly, we expect you to responsibly follow your obligations towards the Exchange. If you, where required, (a) fail to submit data confirming your identity, (b) submit insufficient data or data that are incorrect, (c) avoid submitting information required for establishing your identity, (d) conceal the identity of the beneficial owner or avoid submitting information required for establishing the identity of the beneficial owner or submitted data are insufficient for that purpose, or (e) if we cannot ensure that all legitimate requirements are fulfilled, we reserve the right not to establish or continue business relationship and/or carry out your transactions. If we suspend your account and/or transactions and/or terminate business relationship and/or take any other action we deem necessary in order to manage money laundering and terrorist financing risk, we will not be responsible for non-fulfilment of our obligations to you and for the damage caused by non-execution of your transactions.

**Your Acknowledgement**

By using the Exchange's Services, you confirm that (a) you have read, understood and agree with this Policy, (b) all the data you provide us with before the commencement of our business relationship and afterwards are and will be correct, and (c) you understand all your obligations and the consequences of your failure to fulfil them.