



bluebenx

**Policy Anti-Money
Laundering (AML)**

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 **Summary**

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Policy for Anti-Money Laundering, Terrorism Financing and Concealment of assets, rights and values - AML

The BlueBenx Group and affiliated companies ("BlueBenx"), in accordance with the best market practices and in accordance with the provisions of Law No. to Terrorism and Concealment of Goods, Rights and Values - AML ("Policy") , the management guidelines in its operations, in order to prevent any illicit activities and guide employees, partners and customers, on a process of identification and monitoring, establishing responsibilities at its various levels.

Concepts

Crypto Assets: These are digital assets, protected by cryptography, present exclusively in digital records, whose operations are performed and stored on the world wide web and on the internet.

Money Laundering: Consists of the practice of commercial or financial activities with the aim of disguising or hiding the origin of illicit money. It is the procedure by which the criminal tries to give an air of legality to values arising from an illegal practice, hiding or disguising the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from any illegal activity. .

Corruption: Corruption means any act of promising, accepting, offering or giving, directly or indirectly, an undue advantage to a public agent (or whoever affects him) to the detriment of his position or activity, in any way harming the public administration, or bringing an advantage.

Terrorist Financing: It is characterized by the collection of capital and/or funds to pay for the practice of terrorist activities, values that come from donations or even that have been acquired with the execution of illicit or licit activities.

Politically Exposed Person (PEP): Politically Exposed Persons will be considered as public agents, political agents or people close to these agents, who perform or have performed in the last 5 (five) years, in Brazil or in other countries, territories and foreign offices, positions, jobs, relevant public functions or elective positions.

Representatives, family members (in the first degree) and other people who are intimate or close to people as listed above attract this classification. They also suggest the existence of an intimate or close relationship, capable of equally characterizing the individual as a PEP, those who act as attorney or agent of another PEP, or even who participate in some way in the direct or indirect control of a Legal Entity that is a customer of an PEP.



Steps of Money Laundering Crime

The Money Laundering process involves three steps: placement, concealment and integration.

Placement: This is the moment when the criminal inserts the value obtained illegally from the economic system, transferring it from the place where it was acquired and embedded in the financial market, by whatever means he chooses.

Hiding: It is characterized by carrying out transactions by which it intends to remove such amounts from their illegal origin, in an evident attempt to make it difficult or even prevent the accounting tracking of that resource.

Integration: It is the incorporation of these assets into the economic and financial system. From this moment on, the money takes on a legal appearance.

When any suspicion is identified, the case(s) will be directed to Compliance, which will try to verify the information, with due respect for confidentiality, however, communicating to the authorities it deems necessary.

Know Your Customer (KYC)

KYC (Know Your Customer) is a set of measures adopted to ensure the identity and activity of customers, with analysis, including the compatibility of indicated value with income from professional activity and/or declared assets.

The criterion may have more stringent parameters, according to the assessment of risk associated with any illegal acts, including with regard to the demonstration of the origin of resources and equity. Thus, the information provided must be correct to allow a reliable analysis.

The Compliance area is responsible for the analysis (which can be done – or redone – at any time) of information and documents from clients/Users.

BLUEBENX may search: register of defaulters, lawsuits, criminal records, tax and labor regularity certificates, mainly with regard to the identification of the USER's correlations with money laundering and terrorist financing situations.

Customer operations may be subject to monitoring, and if any indication of irregularity is identified, be it Money Laundering, Terrorist Financing or Corruption, BLUEBENX will report it to Organs competent bodies for investigation, without any exposure of the User.

If any indications of Money Laundering, Terrorist Financing, Corruption of any User are identified, BLUEBENX may choose to suspend the account until further investigation, or even choose to close the User's account.





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