

KYC/AML Policy

INTRODUCTION

The vast majority of criminal activity is committed to generate profits for the perpetrator. There are a whole range of predicate offences that result in criminal property; Money laundering is the process by which criminals disguise the illicit origin of their assets. Criminals seek a way to break a link to the crime and conceal the ownership of criminally derived funds or assets. This can be achieved by changing the form of the criminal property, creating complex ownership structures or by choosing jurisdictions with less stringent anti-money laundering (AML) requirements.

We are committed to the high standards of AML in order to prevent the use of our products and services for money laundering purposes. The standards set out in this Policy are the minimum requirements based on applicable legal and regulatory requirements. These requirements are created to prevent CryptoPay, our employees, partners and clients from being misused for money laundering, terrorist financing or any other financial crime, by doing the following;

- Performing an enterprise-wide risk assessment to determine the risk profile of the Company
- Establishing AML policies and procedures
- Performing know your customer ("KYC") procedures on all users

CUSTOMER IDENTIFICATION

PVPCHAIN Fund identifies the customer by obtaining a range of information about him/her. The verification of the identity consists of verifying some of this information against documents or information obtained from a reliable source which is independent of the customer. At least the following information must be received for identification purposes: name and surname; personal identity number (if such exists); date of birth; photograph on an official document which confirms his/her identity; residential address; the number of the personal identification document; the expiry date of the identification document.

RECORD KEEPING

Records must be kept of all customers' identity, the supporting evidence of verification of identity (in each case including the original and any updated records), our business relationship with them and details of any occasional transactions. As per regulatory requirements, we keep records for at least five years from the date a business relationship ends or from the date of the last transaction.

TRAINING

We make sure that all employees are aware of our AML program and request that training is provided to all employees (new and existing) before conducting business activities, and, at a minimum, must include:

Understanding and recognizing money laundering and fraud

Verifying customer identification

Identifying suspicious activity and structured transactions

Reporting requirements related to all transactions