

1. INTRODUCTION

Stellarity's AML/KYC policy is designed to prevent/mitigate against possible risks that the Stellarity is used as an avenue to perform illegal activities. This AML/KYC policy is conducted by Stellarity Technologies s.r.o, a legal entity incorporated according to the laws of the Czech Republic, Stellarity number 17582601, legal address: Olšanská 2898/4h 13000, Praha, Czech Republic; contact email: legal@stellaritygroup.com (hereinafter referred to as the "**Stellarity**", "**Our**" or "**We**")

Both international and local regulations require the Stellarity to implement effective risk control measures to prevent fraud, money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption, and bribery and to take action in case of any form of suspicious activity from its Customers.

Our AML/KYC policy covers the following:

1. Verification Process
2. Transaction Monitoring
3. Risk assessment

2. VERIFICATION PROCESS

Stellarity, conduct Customer Due diligence (CDD) on every customer that makes any payment to their wallet to prevent illegal activities, and Enhanced Due Diligence (EDD) for customers presenting a higher risk, such as Politically Exposed Persons (PEPS), according to International standards. We use a third party service provider to perform verification. The customer are required to provide at least full name, date of birth, nationality and country of residence. The customer may also be requested to provide a genuine and authentic Government issued IDs, e.g. National ID, International passport, Drivers license and may be required to perform a liveness check (selfie) ID verification as well as proof of residence verification. Steps will be taken to confirm the authenticity of documents and information provided by the customers. The verification process will be decided based on risk category amount of transactions and other parameters that is set from time to time by Stellarity and authorities to be able to follow all relevant rules and regulations. Stellarity reserves the right to investigate customers who have been determined to be risky or suspicious. Customers that pose a higher level of risks require Enhanced Due Diligence where such customers are required to provide additional documents e.g. utility bill for address verification and perform a video selfie.

Stellarity reserves the right to verify Customer's identity on an on-going basis, especially when their identification information has been changed as these changes need to be updated, or customer activity seems to be unusual or suspicious. Stellarity reserves the right to request up-to-date documents from the Customers, even though they have passed verification in the past.

If a customer fails to submit the required identification documents or these documents cannot be verified, Stellarity may refuse to provide service to such customers.

3. TRANSACTION MONITORING

Customer's transaction pattern is also monitored to detect unusual or suspicious transactions. Stellarity will therefore monitor all transactions and it reserves the right to request additional information from customers where transactions seem suspicious and report all suspicious transactions to the relevant authorities through its Compliance officer. The compliance officer will carry out daily monitoring of all transactions to determine which transactions are legitimate and which are suspicious. Suspicious transactions are reported to the relevant authorities.

4. RISK ASSESSMENT

Stellarity assesses and analyses the level of risk that can be posed by each customer in line with the international requirements. We have a risk-based approach which categorises each customer by the level of risk they can possibly pose. This helps to prevent/mitigate fraud, money laundering and terrorism financing.

5. SANCTIONS POLICY

Stellarity is prohibited from transacting with individuals, companies and countries that are on prescribed sanctions lists. Stellarity will therefore screen customers against United Nations, European Union and US Office of Foreign Assets Control (OFAC) sanctions lists in all jurisdictions in which Stellarity operates.