

## **POLICY ON COMBATING MONEY WASHING AND "LAW KNOW YOUR CUSTOMER"**

The goal of the Anti-Money Laundering Policy and Know Your Customer (KYC policy) is to prevent money laundering and terrorist financing activities in the Service by complying with international and national legislation and introducing a user identification procedure.

In this KYC policy document (know your client know your client) and AML (Anti money laundering), the names WELLEX and Wellcoinpay, and all pronouns we use our relates to WELLEX PAYMENT LTD, including, without limitation, its owners, directors, investors, employees and other related parties. Depending on the context of WELLEX and Wellcoinpay may also refer to services, products, website, content or other materials provided by WELLEX PAYMENT LTD.

This policy is an integral part of the Terms of Use. When you accept the Terms of Use, you automatically agree to the KYC Policy.

Capitalized terms not otherwise defined in this KYC Policy have the meaning defined in the Terms of Use.

### **1.LEGAL FRAMEWORK**

The anti-money laundering regime in the United Kingdom is set out in the following legislation:  
Legislation

[http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:JOL\\_2015\\_141\\_R\\_0003&from=ES](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:JOL_2015_141_R_0003&from=ES)  
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R0847&from=LT>  
[http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF\\_Recommendations.pdf](http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf)  
<http://www.legislation.gov.uk/ukxi/2007/2157/contents/made>  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/468210/UK\\_NRA\\_October\\_2015\\_final\\_web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/468210/UK_NRA_October_2015_final_web.pdf)  
<http://www.legislation.gov.uk/ukpga/2002/29/contents>  
<http://www.nationalcrimeagency.gov.uk/publications/464-2014-sars-annual-report/file> The FATF Recommendations, 2012. [http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF\\_Recommendations.pdf](http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf)  
Glossary to the The FATF Recommendations, 2012. [http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF\\_Recommendations.pdf](http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf)  
The FATF Recommendations, 2012. [http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF\\_Recommendations.pdf](http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf)  
Article 4.1(1) of the capital requirements regulation. <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013R0575>  
Glossary to the The FATF Recommendations, 2012. [http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF\\_Recommendations.pdf](http://www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf)  
Compliance with KYC WELLEX PAYMENT LTD will ensure compliance with all relevant legislation and regulations.

### **2.KYC PROCEDURE**

The KYC procedure applies to users suspected of committing illegal transactions. We may ask you for the following identification documents:

Identity Documents:

- National and / or international passport; National Identity Card.
- Address Verification: Copy of utility bill; Phone bill;
- Bank statement.
- Other documents, such as driving licenses, etc.

### **3.USER IDENTIFICATION**

WELLEX PAYMENT LTD has the right to take various measures, including user identification, to prevent money laundering, terrorist financing and other illegal activities by monitoring suspicious user activities, that is, activities that have any elements or signs of prohibited conduct listed in Anti-fraud policy.

WELLEX PAYMENT LTD does not identify each user as a whole. However, WELLEX PAYMENT LTD checks for users whose activities are suspicious.

WELLEX PAYMENT LTD has the right to suspend an account associated with suspicious activities and ask the owner of such an account to undergo a KYC procedure.

### **4.USE OF PERSONAL INFORMATION**

All personal user information and documents collected in connection with the KYC procedure will be used, stored and protected in accordance with our Privacy Policy.

### **5.MONITORING OPERATIONS**

WELLEX PAYMENT LTD will closely monitor transactions in the event of suspicious activity. When such a suspicious activity is detected, the user will need to go through the KYC procedure, otherwise access to the account and all funds will be frozen until the dispute is resolved.

### **6.AMENDMENTS AND AMENDMENTS**

This KYC policy is subject to change at any time at our sole discretion. WELLEX PAYMENT LTD. You acknowledge and agree that it is solely your own responsibility to periodically check the KYC Policy and receive notifications of changes and additions.

If you do not want to accept the amended and / or modified KYC policy, you should not continue to use the Service. Your continued use of the Site and / or the Service after posting changes to the KYC Policy will be deemed your acceptance of these changes.

#### **Anti-Fraud Policy**

This Fraud Policy establishes WELLEX PAYMENT LTD policies in preventing and deterring fraud, corruption, collusion, money laundering, terrorist financing and any other criminal activities in WELLEX PAYMENT LTD. WELLEX PAYMENT LTD is committed to high legal, ethical and moral standards. The public, WELLEX PAYMENT LTD partners and Users have the right to expect that WELLEX PAYMENT LTD implements a significant level of protection against any illegal activity.

The anti-fraud policy has been implemented in accordance with applicable local and international legislation.

#### **Definitions**

Capital terms used in this anti-fraud policy have the following meanings:

**Prohibited conduct** means any illegal conduct that includes fraud, corruption, money laundering, collusion, financing of terrorism and any other criminal behavior.

**Fraud** means using fraud with the intention to pursue personal interests and harm the interests of users and / or the site that belongs to WELLEX PAYMENT LTD.

**Corruption** means offering, giving, receiving or soliciting something directly or indirectly valuable for undue influence on the other side.

**Money laundering** means a financial transaction scheme whose purpose is to hide the identity, source and destination of illegally received money.

**Collusion** means an agreement between two or more parties to achieve an improper goal, including improper influence on the actions of the other party.

**Financing of terrorism** means providing or raising funds by any means, directly or indirectly, with the intention their use or with the knowledge that that they will be used in whole or in part to carry out any of the crimes against terrorism.

**Criminal conduct** means a crime in any part of the world or would constitute a crime in any part of the world if it occurred there.

**Anti-Fraud Commissioner** & mdash; a person authorized to monitor, prevent and investigate prohibited behavior and is responsible for the proper implementation of the Anti-Fraud Policy. Capitalized terms not defined in this Anti-Fraud Policy have the meaning given in the Terms of Use.

## **Investigation of fraud**

If there is a reasonable suspicion that the prohibited conduct has occurred, WELLEX PAYMENT LTD has the right to thoroughly investigate this issue using recognized and legitimate investigation methods.

The Anti-Fraud Commissioner is the first line of detection, investigation and protection in preventing prohibited behavior during the evaluation of users and transactions.

In some cases, outside researchers may be involved in WELLEX PAYMENT LTD to gather sufficient evidence to refer the case to the appropriate flippers Responsibility for managing third parties lies with the Commissioner for Combating Fraud.

During the investigation, the Anti-Fraud Commissioner is responsible for:

- Collect any information regarding alleged Prohibited Conduct, including information about Users and certain transactions.
- Reporting your findings to WELLEX PAYMENT LTD and the relevant authorities, as well as to any third party, if necessary, to know this information.
- The Anti-Fraud Commissioner has the right to open, pursue, close and report on any investigation of the prohibited behavior within its competence without prior notice, consent or intervention by any other person or organization. All investigations will be conducted objectively and confidentially.
- We reserve the right to block user funds in the account while an investigation is underway to ensure a prompt and complete investigation procedure.
- All Users are required to cooperate with the Commissioner promptly, fully and effectively to combat fraud, including by answering relevant questions and fulfilling requests for information and documentation.
- All information and documents collected and created during the Banned activities that are not yet in the public domain should be kept strictly confidential. The confidentiality of the information collected will be respected both in the interests of the persons concerned and in relation to the integrity of the investigation. In particular, confidentiality will be respected during the investigation of prohibited conduct, as this will not be in conflict with the interests of the investigation.
- Anti-Commissioner fraud should disclose such information and documents only to those individuals or organizations that are authorized to receive them if necessary.

## **Responsibilities of the Parties**

The Anti-Fraud Commissioner has the primary responsibility for preventing, monitoring and investigating cases of prohibited conduct.

In connection with the above measures, we can identify any User and / or transaction in accordance with the KYC Policy to identify evidence of prohibited conduct.

In connection with anti-fraud policy, we are responsible for:

- Taking appropriate legal and / or disciplinary measures against persons who have committed prohibited behavior;
- Developing and maintaining effective internal controls to prevent prohibited behavior;
- Conduct intensive and operational investigations if prohibited conduct occurs;
- Reporting any suspicions regarding prohibited conduct to the appropriate state authorities;
- Ensuring that the Anti-Fraud Commissioner reports any internal and external suspicions or incidents related to prohibited conduct.

### **User Statement**

By using our service, you warrant that you do not intend to perform any prohibited actions described here. In addition, you agree to any checks in connection with the investigation in accordance with the Anti-Fraud Policy, and you agree to cooperate fully and promptly with the Commissioner for Combating Fraud within such an investigation.

### **Changes and Amendments**

This anti-fraud policy is subject to change at any time at the sole discretion of WELLEX PAYMENT LTD. You acknowledge and agree that you assume the responsibility to periodically check the Anti-Fraud Policy and receive notifications of changes and additions.

If you do not want to accept the amended Anti-Fraud Policy, you should not continue to use the Service. Your continued use of the Site and / or Service after posting changes to the Anti-Fraud Policy will be deemed your acceptance of these changes.

If you have information about illegal activities, please contact our support: [support@wellcoinpay.com](mailto:support@wellcoinpay.com)