

KYC/AML POLICY AND GUIDELINES for the sale of OTON Token

This Anti-Money Laundering and Know Your Customer Policy and Guidelines are designated to prevent and mitigate possible risks of OTON Token and its sale being involved in any kind of illegal activity.

Both international and local regulations require us to implement effective internal procedures and mechanisms to prevent 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 our Users.

KYC or Know Your Customer is the process of identifying and verifying a customer and his credentials so as to ensure that the services they avail are not misused. In other words, KYC is important to prevent identity theft, financial fraud, money laundering, terrorist financing etc.

In financial area, Anti-Money Laundering checks are an essential part of 'Know Your Customer' (KYC) policies. Not only are these checks becoming increasingly important when preventing identity theft, money laundering and financial fraud, but for many industries they are a legal requirement. In the EU, the AML checks are mandated by the series of the EU Anti-Money Laundering Directives, the UK Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and other national laws requiring banks and other financial institutions to exercise proactive approach in carrying due diligence in respect of their clients.

KYC/AML checks that we do:

Document Integrity Checks	A solution for an automated verification and authentication of 3,500 various types of identity documents from nearly every country worldwide. It allows to determine the authenticity and legitimacy as well as to ensure that the document is not forged or altered.
Face Match Checks	<p>A solution for an automated confirmation that documents belong to a particular person by comparing faces on all the submitted images with each other.</p> <p>Minimum required data for input:</p> <ul style="list-style-type: none">– A selfie of the customer holding an identity document,– Image of document containing the image of the customer's face. <p>A completed search results in a 'Match'/'Doesn't Match' result.</p>
Identity Checks	Verification of a customer's identity by matching his or her identity document data against the data from third party databases.

Proof of Address	<p>We check the address and residency by matching the data against external databases using:</p> <ul style="list-style-type: none"> - driver's license bearing residential address (if not already used as your proof of identity) - tax bills - utility bills - voter rolls - bank statements
Proof of Age (or of any other specific status)	<p>We verify age and other similar characteristics via document analysis and accessing databases and open information.</p>
Sanctions, PEPs, terrorist lists	<p>We access the relevant information from the international sanctions and terrorist lists and other watchlists.</p>

DOCUMENTS THAT WE ACCEPT:

- High resolution scanned copy or photo of pages of a passport or any other proof of identity document, indicating family name and name(s), date and place of birth, document number, issue and expiry dates, country of issue and customer's signature;
- Photo of a customer holding the above document;
- Proof of address (usually a utility bill).

We do not accept proof of identity documents that have been issued less than 1 month ago and those that will expire less than within 3 months. We do not accept images with any graphic corrections. We do not accept JPEG files of the size less than 500 KB and PDF files of quality less than 300 dpi.

In some cases, such as Asia-located projects where the law requires to hide unnecessary personal data, we may accept documents with disguised elements.

In any case we do not accept as proof of address: (1) checks, (2) envelopes with the address as a confirmation of your address of residence, (3) stickers with the address on the parcels as a confirmation of your address of residence, (4) mobile phone bills, (5) insurance documents, (6) medical prescriptions, recipes, invoices, (5) pre-paid card invoices.

SECURITY, CONFIDENTIALITY & DATA PROTECTION

The personal data that we accept for verification is always securely stored on the servers located in safe data centres of our certified service providers that undertake to preserve it as long as it is necessary for the clients. All persons dealing with personal data shall be officially authorized and shall undergo special periodical training. Our service providers hold data protection and security audits by a leading international expert institution. Our

internal procedures are fully compliant with the UK and EU data protection laws, including the EU GDPR. For that, in particular, we conclude detailed Non Disclosure Agreements and Data Processing Agreements with all our counterparties.

USUAL CRITERIA OF DOCUMENTS CHECKS

The document does not comply with integrity criteria:

1. The document is damaged
2. Photo: uneven glue joints, traces of glue around
3. A part of the document is disguised
4. The document does not contain mandatory information
5. The text on the document is non-identifiable
6. There is no mandatory stamp or mandatory signature
7. The text is uneven, or abnormal, or non-standard, or letters are in wrong order or there are grammar mistakes
8. There are odd inscriptions on the document
9. The photo on the document is changed via Photoshop or similar program
10. The customer provided a scan of a photocopy of the document

The selfie is non-compliant

The selfie is non-identifiable:

- Face is smaller than 1/2 of the picture
- There is any kind of headwear on the customer
- The customer wears sunglasses
- The customer wears glasses that impede identification
- The customer wears a scarf or there is anything else on the image that disguises any part of the face
- The picture's resolution is too small

12. The document is held by another person

13. There is more than one document on the picture

The document is not valid

- The document's term of validity is over or will be over within one week;
- The document's number, or a signature on the document, or the photo do not match those on another document (where applicable) or the information from databases (where

applicable)

ENHANCED DUE DILIGENCE

Usually we apply standard KYC and AML procedures for our Users, but we also may apply enhanced KYC (or enhanced Due Diligence) in the following cases:

- 1) Customer risk factors: the customer is Politically Exposed Person (PEP), their family member or known associates; the number of transaction is 10 000 EUR or more.
- 2) Geographical risk factor: countries blacklisted for financing or supporting terrorist activities, for example Iran, Syria, Sudan; countries without adequate AML/CFT systems as identified by credible sources, for example North Korea and Iran.
- 3) Other risk factors: suspicious account activity including suspicious transactions, etc.

For conducting enhanced KYC we may require to obtain additional information from our Users, including any additional documents to analyse the source of funds.

We may also restrain residents from certain countries to purchase OTON Tokens.