

AML & KYC POLICY

1. INTRODUCTION

Having regard for the safety of the users and due to the legal requirements of the European Union and other countries, Ottentik (for CPH4 crypto money) has implemented and started to use KYC (know-your-client, or customer's identification) policy, as well as AML (anti money-laundering) policy (hereinafter - Policies).

The purpose of these Policies is an effective counteraction of money-laundering and terrorist financing on our Services by providing an adequate level of identification of Users of our Services and supervision of Users' transactions. We shall identify and cease transactions made not only to purchase/sell/exchange cryptocurrencies, but made mainly to hide criminal origin of money, finance nonlegal activities or committing other unlawful transactions.

Specific provisions of our policies are confidential and for internal use only, in order to prevent their avoidance by dishonest or fraudulent users. Along with that, we would like to introduce to you some of the general rules and stipulations of our policies which directly concern you and affect our services we render.

2. DEFINITIONS

The terms used in this AML & KYC POLICY have the following meaning:

Services - the services offered by CPH4 by Ottentik via the websites or relevant application (<https://CPH4.ch/> or .fr).

The terms "us", "we", "our", "Ottentik", "Company" refers to Ottentik company.

The terms "User", "you" refers to an individual who has reached the age of consent under the law of the country of the individual's residence and is over 18 years of age, or a legal entity, registered under the laws of the country of residence (in all cases, the User must have full legal capacity), which is authorized for the use of the Service.

3. USER'S IDENTIFICATION

In the first place we are obliged to identify, beyond a reasonable doubt, the identity of persons enabled to do transactions on our exchange. This is the reason why we collect phone number. We require sending phone number in order to preclude the possibility of your account being used by someone else. In case of any doubts our customer support team will contact you to explain any concerns and solve the issues that arose. If we cannot determine, beyond a reasonable doubt, that the phone number you provided belong to you, we won't be able to let you execute any transactions.

4. TRANSACTIONS' MONITORING AND SUPERVISION

Using our proprietary software, we also analyze all transactions that take place on our Service looking for suspicious and unusual transactions. Such selected transactions are analyzed by our AML specialists and evaluated if they do not provide potent AML risks or if they need to be ceased and clarified with the User.

5. ADDITIONAL VERIFICATION

When your trade volume rises, our AML verification duties increase as well. The same happens when your transactions are marked as suspicious or unusual, or our verification of your person results in qualifying you as a person imposing significant AML risk. In such a case we can require additional documentation, such as:

- a) providing your real, exact place of residence, education, occupation.
- b) providing information about the source of money you are using on the exchange.

Unfortunately, if our AML officer decides information received from you doesn't clarify our doubts, we will be obliged to end our cooperation with you and/or report your transactions to relevant government authorities.

6. BASIC AML RULES

Our operating rules include the following:

- a) *CPH4 by Ottentik does not accept cash deposits or cash/ fiat withdrawals in any cases.*
- b) *CPH4 by Ottentik does not accept any third parties' deposits on the user's account, managing the account on behalf of somebody, joint or shared accounts, etc.*
- c) *CPH4 by Ottentik does not allow any exceptions in the field of documentation required from users, if needed.*
- d) *CPH4 by Ottentik reserves the right to refuse to process the User's transaction at any time, in case of suspicion of AML risk.*
- e) *In accordance with international law, we are not obliged (or even forbidden) to inform our clients, if we report their transactions as suspicious to relevant authorities.*

7. COUNTRIES WITH LIMITED ACCESS TO SERVICES

In accordance with our policies we do not open accounts and do not process transactions for citizens and residents of, as well as people staying in, countries where transactions are prohibited by international sanctions or their internal law regulations, or countries which based on various criteria selected by our AML team (for example Corruption Perceptions Index by Transparency International, FATF warnings, countries with weak anti-money laundering and terrorist financing regimes determined by European Commission) impose high AML risk, or have any other restrictions related to blockchain/cryptocurrency transactions.

Currently these countries are:

Afghanistan, Albania, Barbados, The Bahamas, Botswana, Democratic People's Republic of Korea (DPRK), Cambodia, Ghana, Iceland, Iran, Yemen, Jamaica, Mongolia, Myanmar, Nicaragua, Panama, Syria, Trinidad and Tobago, Uganda, , USA, Zimbabwe, Mauritius, Pakistan.

8. KYC VERIFICATION

As You understand, when your trade volume rises, AML risk increases as well. That is why we have to introduce proper safety and verification duties. Currently our KYC / AML verification model is:

<i>Daily amount of transaction (in USD)</i>	<i>KYC measures</i>
<i>More than 10 000</i>	<i>the personal identification (copy of ID card, selfie with ID)</i>
<i>More than 50 000</i>	<i>the conforming source of income, home address (utility bill, bank statement)</i>

CPH4 by Ottentik reserves the right to provide the mentioned above KYC verification measures and/or demand any additional documents on its own discretion.

9. CONTACT US

If You need more information about these AML & KYC POLICY, or have any proposal to improve them, you are welcome to contact our AML team through support at cph4.support@ottentik.com.