

Anti Money Laundering (AML) & Know Your Customer (KYC) Policy

ThirdFi and its employees, third parties, customers, and clients are at all times committed to the highest standards of anti-money laundering (AML) and counter-terror financing (CTF), including anti-fraud, anti-corruption, and taking measures to mitigate against financial crime.

This Policy describes the Company's procedures instituted to ensure that the services offered by the Company are not being used by the users to facilitate the commission of any criminal offences. The Company has prepared this AML Policy to ensure trading transparency and the prevention of money laundering and other illegal activities.

KYC & Due Diligence Procedures

ThirdFi adheres to and complies with the principles of the Know Your Customer (KYC) policy which aims to prevent financial crime and money laundering through client identification and due diligence.

If we find any user information obtained in accordance with the procedure described under this clause to be inadequate, insufficient, or sanction screened, the Company may in its discretion either refuse or terminate (as the case may be) the registration of such user account or require verification of such user's identification documents again.

All customers/account holders, who is new to the service will undergo procedural due diligence checks prior to opening an account, as stipulated below:

Primary Verification Identification

Individual: Personal information (Full name, Nationality, Date of Birth, Residential Address. Email)

Business: Company registered name, Company registration number, contact details of corporate representative, official appointment letter of the corporate representative by Director

Identification & Address Proof: Documents for Identification and home/office address are required with the person/business name on it.

Acceptable documents for verification are:

Individual: Drivers License, Passport, Bank Statement, Utility Bill.

Business: Details of any beneficial owners / controlling directors, Director ID (as per requirements for individuals), Certificate of Incorporation, Company Registration Number & Registered Office, Utility Bill, Bank Statement.

Due Diligence Checks

We shall take reasonable measures to ascertain and verify the true identity of all customers who transact with the Company. We will conduct background checks prior to account acceptance, details of which will be kept on file as evidence of due diligence and anti-money laundering checks. Due diligence checks will be conducted as per the regulations and requirements. All documents, accounts, and transactions

associated with clients/account holders will be retained based on the laws and regulations of the country in that the user signs up. Regular audits are completed on due diligence forms, company checks, and ongoing monitoring. Our team will conduct ongoing due diligence checks for client/customer accounts. This will ensure we keep up-to-date information and data and will also keep a check that no adverse information has arisen since the last due diligence was performed.

Sanction Screening

A risk-based approach will be followed while conducting due diligence and no transactions will be conducted with sanctioned or banned individuals/ entities. As part of our onboarding process, all individual and corporate customers, connected parties of the customer, ultimately beneficial owners of the customer will undergo the screening process. No business or transactions will be conducted with the sanctioned individuals or entities.

We shall apply systems and controls to allow us to comply with all required sanction screening processes imposed by, for example, the United Nations, European Union, UK Treasury and US Office of Foreign Assets Control (OFAC) and to take measures to prevent transacting with individuals, companies and countries appearing on these sanctions lists.

Records Retention

We will ensure that records of all Customer Due Diligence (CDD) documentation and customer transactions are held for a term as mandated by the laws and regulations of the country that the user signs up from. These records include but are not limited to CDD documentation, Business broad risk assessments, and customer risk assessments.)

Should you have any queries pertaining to the policy, please contact us at hello@thirdfi.org

Effective date: March 1, 2023