



UGPay Group AG

AML/KYC Policy

Dated: 13.10.2020



1. GENERAL PROVISIONS

- 1.1. UGPAY Group AG, a joint-stock company registered under the law of Switzerland with its registered number CHE-201.650.325 and registered office at: Aegeristrasse 5, 6300 Zug, Switzerland has a goal to implement the New Economic Evolution of the World, for providing Investors with the shares of CRYPTOUNIT INC. - a limited liability company registered under the British Virgin Islands Business Companies Act 2004 with its registered number 2009699 and registered office at: ABM Chambers, P.O. BOX 2283, Road Town, Tortola, VG1110, British Virgin Islands (hereinafter referred to as the “CRYPTOUNIT.”), a platform, knowledge, training activities, and tool that will help to develop their own investment portfolios and will give an access to a global investment balanced portfolio (hereinafter referred to as the “UGPay” or “The Company”). UGPAY Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML/KYC Policy”) is designated to prevent and mitigate possible risks of UGPAY being involved in any kind of illegal activity.
- 1.2. Both international and local regulations require UGPAY 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 its Investors.

2. VERIFICATION PROCEDURES

- 2.1. One of the international standards for preventing illegal activity is customer due diligence (“CDD”). According to CDD, UGPAY establishes its own verification procedures within the standards of anti-money laundering and “Know Your Customer” frameworks.
- 2.2. UGPAY identity verification procedure requires the Investor to provide UGPAY with reliable, independent source documents, data or information (e.g., national ID, international passport, bank statement, utility bill). For such purposes UGPAY reserves the right to collect Investor’s identification information for the AML/KYC Policy purposes.
- 2.3. UGPAY will take steps to confirm the authenticity of documents and information provided by the Investors. All legal methods for double-checking identification information will be used and UGPAY reserves the right to investigate certain Investors who have been determined to be risky or suspicious.
- 2.4. UGPAY reserves the right to verify Investor’s identity in an on-going basis, especially when their identification information has been changed or their activity seemed to be suspicious (unusual for the particular Investor). In addition, UGPAY reserves the right to request up-to-date documents from the Investors, even though they have passed identity verification in the past.
- 2.5. Investor’s identification information will be collected, stored, shared and protected strictly in accordance with the UGPAY Privacy Policy and related regulations.
- 2.6. Once the Investor’s identity has been verified, UGPAY is able to remove itself from potential legal liability in a situation where Cryptounit Platform is used to conduct illegal activity.



3. COMPLIANCE OFFICERS

- 3.1. The Compliance Officers is the persons, duly authorized by UGPAY, whose duty is to ensure the effective implementation and enforcement of the AML/KYC Policy. It is the Compliance Officer's responsibility to supervise all aspects of UGPAY anti-money laundering and counter-terrorist financing, including but not limited to:
- a. Collecting Investors' identification information.
 - b. Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations.
 - c. Implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs.
 - d. Updating risk assessment regularly.
 - e. Reporting the knowledge or suspicion (if UGPAY knows or suspects or has reasonable grounds for knowing or suspecting that another person is engaged in criminal conduct or is involved with terrorism or terrorist property) to: (i) the Swiss Financial Market Supervisory Authority FINMA, pursuant to the Swiss Criminal Code if the disclosure relates to criminal conduct or money laundering; or (ii) Money Laundering Reporting Office Switzerland pursuant to the Federal Act on Combating Money Laundering and Terrorist Financing in the Financial Sector of the Switzerland, if the disclosure relates to involvement with terrorism or terrorist financing and property. Such a report shall not be treated as a breach of confidence or of any restriction upon the disclosure of information imposed by any enactment or otherwise.
- 3.2. The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

4. ANTI-MONEY LAUNDERING POLICY

- 4.1. UGPAY enforces a strict anti-money laundering policy with zero tolerance for money laundering activities. We define money laundering as any activity that is carried out in an attempt to misrepresent the source of funds actually acquired through illegal processes as funds that were acquired through lawful sources/activities.
- 4.2. UGPAY ensures complete compliance with laws pertaining to anti money laundering through its related policy.
- 4.3. UGPAY implements a range of filtration operations for swift and accurate identification of any financial activities that may constitute or are related to money laundering. This helps ensure a money laundering-free financial operations throughout the UGPAY.
- 4.4. UGPAY (and/or its delegate) may request such evidence as is necessary to verify the identity and source of funds of a prospective Investor and to confirm the AML status of any redeeming WorldCru token holder. UGPAY and Cryptounit shall not accept or repay any bonuses and/or application for WorldCru tokens and shall not pay any bonuses until all information required for verification purposes has been provided.
- 4.5. All Investors acknowledge, undertake and agree to the following terms:
- 1) The Investor will comply (throughout the time as a Cryptounit Investor) with all relevant



statutes pertaining to money laundering and proceeds from criminal activities.

- 2) UGPay operates under certain obligations known as “know-your-customer” obligations which grant UGPay the right to implement anti-money laundering procedures to help detect and prevent money laundering activities where money laundering may mean to handle any funds associated with any illegal activity regardless of the location of such activity.
- 3) The Investor agrees to lend full cooperation to UGPAY and Cryptounit with respect to anti-money laundering efforts. This involves providing information that UGPay requests regarding the Investor’s data.
- 4) UGPay reserves the right to delay or stop any WorldCru tokens transfer if there is reason to believe that completing such a transaction may result in the violation of any applicable law or is contrary to acceptable practices.
- 5) UGPay reserves the right to suspend or terminate or freeze the WorldCru tokens if there is reason to believe that WorldCru token is being used for activities that are deemed unlawful or fraudulent.
- 6) UGPay has the right to use Investor’s information for the investigation and/or prevention of fraudulent or otherwise illegal activities.
- 7) UGPay has the right to share Investor’s information with:
 - a) Investigative agencies or any authorized officers who are helping UGPay comply with applicable law, including anti-money laundering laws and know-your-customer obligations;
 - b) Organizations that help UGPay provide the services it offer its Investors;
 - c) Government, law enforcement agencies and courts;
 - d) the Swiss Financial Market Supervisory Authority FINMA, pursuant to the Swiss Criminal Code if the disclosure relates to criminal conduct or money laundering;
 - e) Money Laundering Reporting Office Switzerland pursuant to the Federal Act on Combating Money Laundering and Terrorist Financing in the Financial Sector of the Switzerland, if the disclosure relates to involvement with terrorism or terrorist financing and property.

4.6. UGPay prohibits acceptance of funds by any persons or entities that are acting, directly or indirectly:

- in contravention of any U.S. or international laws and regulations, including anti-money laundering regulations or conventions;
- on behalf of terrorists or terrorist organizations, including those persons or entities that are included on the List of Specially Designated Nationals and Blocked Persons maintained by the U.S. Treasury Department’s Office of Foreign Assets Control¹;
- for a senior foreign political²;
- for a foreign shell bank.

4.7. Activities that UGPay considers possible indications of money laundering include:

- 1) The Investor showing unusual apprehension or reservations about UGPay’s anti-money laundering policies.
- 2) The Investor failing to provide legitimate sources for their funds.
- 3) The Investor providing false information regarding the source of their funds.

¹“OFAC”, as such list may be amended from time to time

²figure, any member of a senior foreign political figure’s immediate family or any close associate of a senior foreign political, unless the CRYPTOUNIT, after being specifically notified in writing that the Investor is such a person, conducts further due diligence, and determines that such acquisition shall be permitted



- 4) The Investor having a history of being the subject of news that is indicative of civil or criminal violations.
 - 5) The Investor seems to be acting as a 'front man' for an unrevealed personality or business, and does not satisfactorily respond to requests for identifying this personality or business.
- The above list is by no means an exhaustive list. UGPAY monitors its Investor and takes appropriate measures to prevent money laundering.

5. KNOW YOUR CUSTOMER (KYC)

- 5.1. The Investor acknowledges that he/she/it has to complete a KYC check for the purchase of the WorldCru tokens which must be in form and substance satisfactory to the Company. KYC check shall be carried out before completing the Agreement by providing necessary information with regard to identification of the Investor, beneficial owner and origin of the funds, the scope and type of information depending on the type of Investor and the purchase amount.
- 5.2. During the Investor's purchase of WorldCru tokens an individual Investor shall provide the following identification information to the Company:
 - 1) Investor's full name;
 - 2) Investor's date and place of birth;
 - 3) Country of residence/location of Investor;
 - 4) Investor's address;
 - 5) Mobile telephone number and e-mail;
 - 6) Proof of identity (passport, id card, driver license details).
- 5.3. After receiving the identification information the Company's staff can verify this information requesting the appropriate documents. Appropriate documents for verifying the identity of Investor include, but are not limited to, the following: for an individual Investor: a high resolution scanned copy or photo of pages of a passport or any other national ID, indicating family name and name(s), date and place of birth, passport number, issue and expiry dates, country of issue and Investor's signature, selfie with Investor's passport or any other national ID;
- 5.4. To verify proof of address of the Investor the Company requires one of the following to be provided, in the same correct name of the customer: a high-resolution copy of a utility bill (fixed-line phone, water, electricity) issued within the last 3 months; A copy of a tax or rates bill from a local authority; A copy of a bank statement (for a current account, deposit account or credit card account); A copy of a bank reference.
- 5.5. The Investor is obliged to collaborate with regard to the KYC/AML check and to provide any information and document deemed necessary by the Company.
- 5.6. The Company may reject any Investor in its sole discretion after the without being obliged to disclose any reason for the rejection.
- 5.7. In case the automatic procedures fail, the Company shall contact the Investor by email or other means to obtain the information and documents needed. In case the Investor does not provide the documents in the requested form and any other information requested to satisfy the KYC/AML check within 10 (ten) days which are not public holidays in the Switzerland of the Company's request, UGPAY may reject the Investor and the costs for the KYC/AML check will be at the cost of the Investor. Additionally, the Company has the right to partially or fully withhold the received



amounts for any costs or damages incurred by the Company. All kinds of remittance fees either for FIAT currency or for cryptocurrencies shall be borne by the Investor.