



AML POLICY

2025

MeteorEx s.r.o., a company duly incorporated in the Czech Republic with registered company number 21270244 and registered office address at Rohanske nabreži č.p. 678, č.o. 23, Karlin, 186 00 Prague 8 ('MeteorEx', 'us', 'we', 'our').

Virtual currencies constitute the primary business area of MeteorEx s.r.o. and represent one of the most dynamic, rapidly evolving, and innovative sectors in today's financial services realm.

MeteorEx is authorized by the Ministry of Industry and Trade of the Czech Republic to provide services related to the virtual assets.

Within the granted authorisation MeteorEx provides to its customers virtual currency exchange services and virtual currency storage (wallet) services.

We place particular emphasis on identifying, preventing, and mitigating risks associated with the provision of services related to virtual currencies and virtual currency transactions.

To prohibit and actively prevent money laundering and any activity that facilitates money laundering, the funding of terrorist and financing proliferation or criminal activities we have established the system of internal rules and measures that comply with all applicable requirements set under the following regulation:

- Act No. 253/2008 Coll. on Certain Measures against Money Laundering and Financing of Terrorism,
- Decree No. 67/2018 Coll. On Certain Requirements for the System of Internal Principles, Procedures and Control Measures against Money Laundering and Terrorist Financing,
- Act No. 69/2006 Coll. on the Implementation of International Sanctions,
- Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and amending Directives 2009/138/EC and 2013/36/EU,
- Act No. 70/2006 Sb., amending the Act. No. 69 Coll.,
- Criminal Code of the Czech Republic,
- Regulation (EU) No 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds and repealing Regulation (EC) No 1781/2006,
- Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC.

In a simplified way: legalization of revenues from criminal activities (in laic terms: 'money laundering') means an activity when a customer uses the services

of MeteorEx for covering illegal origin of its property or to make its back tracking difficult. Similar rules as those applied in MeteorEx are binding for similar types of business in the Czech Republic as well as in other countries, because money laundering and terrorism financing is nearly always performed on international level.

MeteorEx services are provided only to those customers, who had completely passed '*Know Your Customer*' (KYC) steps and requirements.

We collect essential customer identification details from every customer who seeks our services, as part of the KYC procedure:

- customers are required to furnish basic identity details including their complete name (first, last, middle, and former if applicable), residential address (including country, postal code, state, and city), date of birth, citizenship, phone number, and email address.

We identify and verify the identity of all customers.

Customers' electronic identification and verification process is ensured by using third party identity verification services.

During customer KYC process we usually request the following minimum of documents:

- valid government-issued identification document such as an international passport or national identity card with MRZ code, along with documents verifying the residential address, such as utility bills or bank statements. It is important to note that certain documents like mobile phone bills, medical bills, purchase receipts, insurance statements, or screenshots of address proofs will not be accepted.

This above list of documents we usually request is not exhaustive, and MeteorEx reserves the right to request additional information and documents at any time to gain a comprehensive understanding of the customer, its occupation and to address any concerns or suspicions related to money laundering, terrorism financing, or other financial crimes.

Before establishing a business relationship, as well as within the lifetime of the established business relationship, we use additional tools to check each potential or actual customer, against:

- sanctions list, domestic as well as OFAC, EU, and UN, sanctions list, and other applicable SDN lists,
- PEP lists,
- surrounding adverse media.

It is essentially important for MeteorEx not to establish any business relationship with the customers who have born in, are citizens of, resides in or

have other close ties with the following countries recognized by MeteorEx as a non-cooperative country:

- Afghanistan
- Bahamas
- Barbados
- Botswana
- Cambodia
- Crimea
- Cuba
- Democratic People's Republic of Korea (DPRK)
- Ghana
- Iran
- Iraq
- Jamaica
- Lebanon
- Libya
- Mauritius
- Myanmar/Burma
- Nicaragua
- Pakistan
- Panama
- Russian Federation
- Syria
- Trinidad and Tobago
- Ukraine's Luhansk region
- Ukraine's Donetsk region
- Uganda
- United States of America
- Vanuatu
- Venezuela
- West Bank and Gaza Strip
- Yemen
- Zimbabwe
- Belarus.

Customers obligations and consequences of their breach:

- It is responsibility of the customer to provide us with the information necessary to carry out KYC process, including the submission of relevant documents and all cooperation necessary to fulfil the obligations arising from our AML/CTF mandatory obligations,
- Failure to comply with KYC process or failure to provide the necessary cooperation on customer's part will result in refusal to establish business relationship, execute the transaction, termination of the customer and reporting to the MeteorEx supervising authority,
- We are obliged to report suspicious transactions without undue delay to the FAO (Financial Analytical Office, <https://fau.gov.cz/en>), which will then decide on further measures applicable to the customer/particular transaction.

We reserve the right to impose individual limits in respect of transactions volume and value depending on customer's ML/TF risk type assigned by us.

We also reserve the right to re-assign customer's initial ML/TF risk type at any time if risk assessment parameters of the customer have changed or new parameters have appeared which caused initially assigned customer's ML/TF risk type re-assessment.

MeteorEx ML/TF risk assessment is based on the Risk-Based-Approach.

MeteorEx does not establish any business relationship with the customer until customer is fully identified.

Without prejudice to the other provisions set forth hereof above, MeteorEx does not establish any business relationship if:

- the customer is not fully identified,
- the customer's occupation falls under non-cooperative types of industries recognized as such by MeteorEx,
- the customer surrounded by negative adverse media, have been previously criminally liable, or sentenced for any ML/TF crime or other financial offence,
- in other cases, recognized by us posing significant threat of ML/TF, overall stability of the domestic and supranational financial market, MeteorEx, its customers and partners reputation.

MeteorEx, being aware of the seriousness of consequences money laundering crimes may cause, makes its best efforts to combat money laundering at proactive stage by stopping criminals from disguising the origins of funds connected to illegal activity.

For that purpose, we carefully review our internal AML/CTF rules and procedures and reserve the right to amend these rules unilaterally at any given moment.

We will notify our customers of any amendments in a timely manner.

Each customer is obliged to regularly follow our website subject to any amendments made to the documents placed there.