



## **AML Policy**

Anti-Money Laundering and Counter-Terrorist Financing BLUMANSTOCK is committed to providing safe, compliant, and reputable services to identify, detect, prevent, and report on money laundering, terrorist financing, and other improper activities under applicable AML Laws, CTF Laws, Anti-Corruption Laws, and Economic Sanctions Laws. Accordingly, BLUMANSTOCK insists on a comprehensive and thorough user due diligence process implementation and ongoing analysis and reporting. By agreeing to these Terms of Service, you shall affirmatively certify that you are not a Prohibited Person and are not utilizing a Digital Tokens Wallet for the benefit of a Prohibited Person, and must provide promptly all information requested and necessary to satisfy due diligence requirements and obligations pursuant to applicable Laws and the compliance policies or procedures of BLUMANSTOCK or any of its Associates.

Additionally, BLUMANSTOCK may assess whether you will make, or intend to make, a deposit, withdrawal, or transfer of Fiat or Digital Tokens to, from, or through a U.S. Financial Institution to facilitate the provision of the Services, and if applicable, you must provide all information requested and necessary to satisfy due diligence requirements and obligations pursuant to applicable Laws and the compliance policies or procedures of BLUMANSTOCK.

You agree to provide promptly any documentation, information, or records requested by BLUMANSTOCK at any time, including, but not limited to, a self-certification permitting the determination of tax residence and status Tax Information Exchange Laws. Such information may include, but is not limited to, self-certifications as to beneficial ownership and control. BLUMANSTOCK needs to retain certain information, documentation, and records on file pursuant to applicable Laws and its contractual relationships, and BLUMANSTOCK hereby expressly reserves the right to keep such information, documentation, and records.

Additionally, BLUMANSTOCK monitors for and assesses suspicious or sanctionable transactions under applicable AML, CTF, Anti-Corruption, and Economic Sanctions Laws, as well as undertakes mandatory reporting to FinCEN, OFAC, FIA, and international regulators. These undertakings shall apply even when you suspend or terminate your relationship with BLUMANSTOCK or abandon your application to have a Digital Tokens Wallet. Our policies apply to any and all Digital Tokens, Fiat, and other funds or property being exchanged on or through the Site or by any of you, your Affiliates, of any of BLUMANSTOCK's Associates.

BLUMANSTOCK reserves the right to bar transactions from or to, to undertake enhanced due diligence, or to suspend or terminate the administration of Services, or the creation or administration of any Digital Tokens Wallet for or with, any user for any reason (or for no reason) at any time, including, but not limited to, the provisions of paragraphs 33 and 34 in our Terms of Service, subject to any limitations imposed by applicable Laws.



Without limiting the generality of the foregoing, this includes, but is not limited to, any transfer, transaction, business, or dealing with a:

Sanctioned Person

Prohibited Jurisdiction or a citizen or resident of, Government or Government Official of, or Person in or subject to jurisdiction of, any Prohibited Jurisdiction;  
U.S. Person, Bulgaria, Belgium, Quebec Person;

Person from or in any jurisdiction that does not meet international AML–CTF standards (including any jurisdiction identified by the FATF as high-risk, none cooperative, or strategically deficient jurisdictions, including, but not limited to, North Korea, Botswana, Cambodia, Ethiopia, Ghana, Pakistan, Serbia, Sri Lanka, Trinidad and Tobago, Tunisia and Yemen)

Person that is a Government Official or Politically Exposed Person within the meaning of the FATF’s 40 Recommendations

Person that presents a risk of any exposure to penalties, sanctions, or other liabilities under AML Laws, CTF Laws, Anti-Corruption Laws, Economic Sanctions Laws, or tax Laws that may apply

Person that BLUMANSTOCK determines is acting in the United States or Territory or Insular Possession of the United States (whether or not by, to, through, or from a U.S. Financial Institution) in violation of, causing any other Person, including, but not limited to, any of the Associates, to violate, attempting or conspiring to violate, or evading or circumventing these Terms of Service or applicable Laws

Person that fails to meet any user due diligence standards, requests, or requirements of BLUMANSTOCK, or otherwise appears to be of high risk, including, but not limited to, any of the foregoing factors. In lieu of refusing registration, access or ongoing administration of your Digital Tokens Wallet, BLUMANSTOCK may, in its sole discretion, perform enhanced due diligence procedures. At all times, you may be subject to enhanced due diligence procedures in your use of the Site and any Service. If you decline to provide requested due diligence information or otherwise do not reply timely or substantively with the documentation or data requested, BLUMANSTOCK has the absolute discretion to suspend or terminate Services to you immediately.