**Know Your Customer (KYC)/Customer Due Diligence (CDD) Policy**

Purpose: The purpose of KYC/CDD is to prevent financial services providers from being used, intentionally or unintentionally, by criminal elements for money laundering activities. KYC/CDD policies enable financial services providers to know or understand their customers and their financial dealings.

Overview: The KYC/CDD Policy identifies the specific customer and transaction information collected and recorded, as well as the verification of customer identification and government filings in accordance with regulatory expectations.

Summary: Acme, LLC dba Initech Vending (“Initech”) collects and records certain information from every customer that completes a transaction; utilizes a risk-based approach to verify the identity of certain customers; and records transaction information, customer identification, and verification methods. Initech has implemented a tier system based on transactional amount to determine, at minimum, the pieces of information and identification to be collected and verified. Additionally, Initech leverages this information to perform OFAC and other watchlist screening of all customers, as well as CTR filings for transactions in excess of $10,000.

In situations where either a customer or DASH address is party to multiple transactions within a single business day, Initech will aggregate the transactions and apply the aggregated amount to its tier system.

Exceptions: Initech will not grant any exceptions to its KYC/CDD Policy.

Initech will not execute the customer-requested transaction under the following circumstances: (1) The customer is unable to present an unexpired government-issued photo identification when required, (2) Initech is unfamiliar with the type of identification presented, or (3) when Initech is otherwise unable to verify the true identity of the customer.

Details: The KYC/CDD tiers are as follows.

**Tier 1 (transactions <$300)**

Initech will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash for DASH-denominated cryptocurrency or, conversely, an exchange of DASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts less than $300.

1. Full Name
2. Phone Number
3. Address (including zip code)
4. DASH Wallet Address
5. Transaction Amount (U.S. Dollar; DASH)
6. Transaction Date
7. Transaction Time
8. Transaction Location

Additional action(s):

(I) OFAC and other watchlist screening  
  
**Tier 2 (transactions $300 - <$1,000)**

Initech will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash for DASH-denominated cryptocurrency or, conversely, an exchange of DASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts ranging from $300 to <$1,000.

(1) Full Name   
(2) Phone Number   
(3) Address (including zip code)  
(4) DASH Wallet Address   
(5) Transaction Amount (U.S. Dollar; DASH)  
(6) Transaction Date   
(7) Transaction Time  
(8) Transaction Location  
  
Additional action(s):

(I) OFAC and other watchlist screening   
(II) Review blockchain explorer data

**Tier 3 (transactions $1,000 - $10,000)**

Initech will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash for DASH-denominated cryptocurrency or, conversely, an exchange of DASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts ranging from $1,000 to $10,000.

(1) Full Name  
(2) Phone Number  
(3) Address (including zip code)  
(4) Date of Birth  
(5) Tax Identification Number  
(6) Government-issued identification, unexpired  
(7) DASH Wallet Address   
(8) Transaction Amount (U.S. Dollar; DASH)  
(9) Transaction Date  
(10) Transaction Time  
(11) Transaction Location

Additional action(s):

(I) OFAC and other watchlist screening   
(II) Review blockchain explorer data   
(III) Verification of customer information, including identification

**Tier 4 (transactions >$10,000)**

Initech will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash or, conversely, an exchange of DASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts greater than $10,000.

(1) Full Name  
(2) Phone Number  
(3) Address (including zip code)  
(4) Date of Birth  
(5) Tax Identification Number  
(6) Government-issued identification, unexpired  
(7) DASH Wallet Address   
(8) Transaction Amount (U.S. Dollar; DASH)  
(9) Transaction Date   
(10) Transaction Time  
(11) Transaction Location  
  
Additional action(s):

(I) OFAC and other watchlist screening   
(II) Review blockchain explorer data   
(III) Verification of customer information, including identification   
(IV) Filing of a Currency Transaction Report (“CTR”)

Summary: The table below identifies the customer information, transaction information, verification, and additional actions conducted within the four (4) KYC/CDD tiers, as detailed above.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | *Collected / Recorded Information* | **Tier** | | | |
| **1** | **2** | **3** | **4** |
| *Customer*  *Information* | Full name | ☑ | ☑ | ☑ | ☑ |
| Phone number | ☑ | ☑ | ☑ | ☑ |
| Address | ☑ | ☑ | ☑ | ☑ |
| Date of Birth |  |  | ☑ | ☑ |
| Tax Identification Number |  |  | ☑ | ☑ |
| Government ID |  |  | ☑ | ☑ |
| *Transaction*  *Information* | DASH address | ☑ | ☑ | ☑ | ☑ |
| Amount | ☑ | ☑ | ☑ | ☑ |
| Date | ☑ | ☑ | ☑ | ☑ |
| Time | ☑ | ☑ | ☑ | ☑ |
| Location | ☑ | ☑ | ☑ | ☑ |
| OFAC and other watchlist screening | | ☑ | ☑ | ☑ | ☑ |
| Review blockchain explorer data | |  | ☑ | ☑ | ☑ |
| Verification of customer information | |  |  | ☑ | ☑ |
| CTR filing | |  |  |  | ☑ |

Records: Initech will retain the aforementioned records relating to its KYC/CDD Program and any supporting records. Initech will retain these records for at least five (5) years after the date of transaction. These records will be filed or stored in such a way as to be accessible within a reasonable period of time.

Approval: Initech’s Senior Management has approved the KYC/CDD Policy. This approval is indicated by the signature below.

Signed:

Name:

Title:

Date: