



AML & KYC Compliance Policy

AML/KYC POLICY

BlueLink Blockchain – BLT Token Presale

Effective Date: July 25, 2025

Jurisdiction: British Virgin Islands (BVI)

Applies To: All Participants in the BLT Token Presale

1. Introduction

BlueLink Blockchain (the “Company”) is committed to adhering to all applicable Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) laws, regulations, and standards in the jurisdictions in which it operates. As the BLT token is being issued through an entity incorporated in the British Virgin Islands (BVI), this AML/KYC Policy has been developed in compliance with:

- BVI Anti-Money Laundering Regulations, 2008
- BVI Anti-Money Laundering and Terrorist Financing Code of Practice, 2008
- Financial Action Task Force (FATF) Recommendations
- BVI Sandbox Guidelines for regulatory engagement

2. Purpose

This Policy aims to:

- Prevent the misuse of the BLT token presale for illicit activities, including money laundering and terrorist financing;
- Ensure proper identification and verification of all contributors;
- Meet the regulatory obligations imposed by BVI law through a risk-based compliance framework.

3. Scope

This AML/KYC Policy applies to:

- All individuals and institutions participating in the BLT Token Presale via the official presale website;
- Contributors located outside restricted jurisdictions (see Section 5);
- Both retail and institutional purchasers.

4. KYC Verification Requirements

All contributors must complete Know Your Customer (KYC) procedures via a secure, compliant identity verification system **prior** to participating in the presale.

4.1 Individual Contributors Must Submit:

- Full legal name
- Residential address
- Valid government-issued identification (passport or national ID)
- Selfie or liveness verification
- Proof of address (e.g., utility bill or bank statement issued within the last 3 months)
- Declaration of source of funds/wealth
- Consent for data processing under applicable data protection laws (e.g., BVI Data Protection Act, GDPR if applicable)

4.2 Institutional Contributors Must Submit:

- Certificate of Incorporation
- Proof of company address
- Corporate structure chart
- List of directors and ultimate beneficial owners (UBOs)
- Valid ID for all UBOs holding 25% or more ownership
- Proof of authority (e.g., board resolution or power of attorney)
- Declaration of source of funds/wealth

5. Restricted Jurisdictions

Participants from the following jurisdictions are strictly prohibited from participating in the presale:

- United States of America

- India
- Thailand
- Japan
- China
- Any jurisdiction listed by FATF as high-risk or subject to UN or OFAC sanctions

The Company reserves the right to update this list without prior notice in response to legal or regulatory requirements.

6. Risk-Based Approach

The Company adopts a risk-based approach (RBA) to AML compliance, which includes:

- Categorizing participants as low, medium, or high risk
- Applying Enhanced Due Diligence (EDD) to high-risk profiles (e.g., Politically Exposed Persons or high-volume contributors)
- Monitoring for suspicious or unusual activity on an ongoing basis

7. Record Keeping

All KYC and transactional records will be securely stored and maintained for a **minimum of five (5) years** following the end of the business relationship or completion of the presale, in accordance with applicable laws and data protection requirements.

8. Reporting Obligations

Suspicious activities or transactions will be reported to the **BVI Financial Investigation Agency (FIA)** without delay. The Company will fully cooperate with authorized regulatory and enforcement bodies in compliance with valid legal requests.

9. Compliance Officer

The Company shall appoint a **Designated Compliance Officer (DCO)** who will be responsible for:

- Overseeing implementation of this AML/KYC Policy
- Conducting internal staff training on compliance matters
- Filing necessary reports with the FIA
- Performing periodic audits of AML procedures

10. Policy Review and Amendments

This policy will be reviewed **at least annually**, or more frequently if prompted by significant legal or regulatory changes affecting AML/KYC compliance in the BVI or globally.

11. User Declaration

By participating in the BLT Token Presale, all users and contributors explicitly agree to:

- Undergo full KYC verification;
- Submit complete, accurate, and truthful information;
- Not attempt to circumvent AML/KYC procedures;
- Accept and adhere to the terms outlined in this AML/KYC Policy.

Contact Information

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🌐 Website: <https://www.bluelinkblockchain.com>

💰 Presale Portal: <https://presale.bluelinkblockchain.com>