



ANTI-MONEY LAUNDERING POLICY

AML
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1. INTRODUCTION

GCB Suisse AG maintains Know Your Customer (“KYC”) and Anti-Money Laundering (“AML”) policies, as set out by FINMA, in regards to verifying the identity of its clients and assessing potential risks of illegal intentions for the business relationship.

Every account holder goes through an on-boarding process that includes a background check and mobile phone verification. We implement these policies not to preclude anyone from the service, but to strengthen the integrity of our company for all stakeholders.

The aforementioned AML Policies, Procedures and Controls of GCB Suisse AG:

- Set out clearly the company's policies and principles set up by board of directors and shareholders of the company, and for management to uphold Contribute towards a better understanding of corporate decisions by our employees.
- Aim to motivate staff to achieve the maximum possible potential for all stakeholders

These Policies, Procedures and Controls are required to be implemented by all staff members at every level of the company on a day – to – day basis.

This document brings together individual company Policies, Procedures and Controls into one document that sets out the standards expected of shareholders, senior management, employees, service providers, clients, and suppliers, and provide a code of ethical and professional conduct for everyone to follow.

2. ANTI-MONEY LAUNDERING POLICY

It is the policy of the Company to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorism or criminal activities. All employees of the company are required to commit to maintaining the highest possible ethical standards of business conduct and adhere strictly to the Company's AML and KYC Compliance policies and procedures.

Money Laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived income so that the unlawful proceeds appear to have derived from legitimate origins or constitute authentic assets.

3. CLIENT IDENTIFICATION

The purpose of Client Identification is to:

- Mitigate risk from online fraud (identity and age verification)
- Comply with regulatory regional and international Anti-Money Laundering regulations

The client is identified by the company during the sign-up and on-boarding process in the mobile app, and in order to be eligible to become a GCB Client the following information must be provided.

- Valid Passport copy
- Proof of Address
- Email address
- Mobile Phone Number
- Phone Interview (video requirement for annual purchases above CHF 5'000)

4. CLIENT DUE DILIGENCE

All eligible Clients are subject to a Due Diligence process, both during the sign-up process as well as afterwards during the business relationship.

All Client personal data as well as documents is verified by GCB Suisse AG against updated watchlists as required by current AML legislation.

5. RECORD KEEPING OF IDENTIFICATION

All Client Identification and Due Diligence records are kept encrypted. Backups of all client data and transactions will be kept for the time required by law.

6. LIMITATIONS

Clients are personally responsible for their own activities.

Any funds arriving from other source than the clients personal verified bank account will not be accepted unless given prior permission and clarification.

7. CLIENT ACTIVITY MONITORING TO DETECT SUSPICIOUS ACTIVITY

GCB Suisse AG does not actively monitor client activity. Meanwhile, all staff must raise an internal report where they have knowledge or suspicion, or where there are reasonable grounds for having knowledge or suspicion, that another person is engaged in money laundering, or that terrorist property exists.

8. STEPS TO BE TAKEN WHEN SUSPICIOUS ACTIVITY IS DETECTED

GCB Suisse AG nominated officer (or their appointed alternate) must consider all internal reports regarding suspicious activity.

GCB Suisse AG nominated officer (or their appointed alternate) must make an external report as soon as is practicable if he considers that there is knowledge, suspicion, or reasonable grounds for knowledge or suspicion, that another person is engaged in money laundering, or that terrorist property exists.

GCB Suisse AG must seek consent before proceeding with a suspicious transaction or entering into arrangements.

GCB Suisse AG's nominated officer (or their appointed alternate) must make an external report as soon as is practicable if he considers that there is knowledge, suspicion, or reasonable grounds for knowledge or suspicion, that another person is engaged in money laundering, or that terrorist property exists.

It is a criminal offence for anyone, following a disclosure to a nominated officer, to do or say anything that might either 'tip off' another person that a disclosure has been made or prejudice an investigation.

9. AUDIT PROCESS TO TEST CONTROLS

GCB Suisse AG's Anti-Money Laundering Policies, Procedures and Controls are audited from time to time, as deemed necessary, by Swiss independent auditors approved by the Swiss Financial Authority FINMA.

10. COMPLIANCE WITH U.S. SANCTIONS PROGRAMS

Each GCB Suisse AG's Client is checked against the Specially Designated Nationals and Blocked Persons List (the "SDN List") issued by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"), at the time the relationship is established and on an ongoing basis. Any Activity with a person or entity found to be on the SDN List is immediately terminated; and

No Activity is conducted in a country subject to OFAC sanctions programs.