

# AML AND KYC POLICY

## INTRODUCTION

Opportunity OU (hereinafter – “StarTerra”) Anti-Money Laundering and Know Your Customer Policy (hereinafter – “AML and KYC Policy”) is designated to prevent and mitigate possible risks of StarTerra being involved in any kind of illegal activity. Both international and local regulations require StarTerra to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Users. This AML and KYC Policy applies to both natural and legal persons. Legal entities joining the StarTerra IDO, which is defined as making a StarTerra token or any other StarTerra platform partnering project token purchase in a specific method stated in the clause 4 of this AML and KYC Policy will receive purchased tokens to their Terra address after required AML and KYC procedures that include providing specific documents.

### **AML and KYC Policy covers the following matters:**

1. Verification procedures.
  - 1.1. Basis
  - 1.2. Identity verification
  - 1.3. Anti-money laundering procedure
  - 1.4. Authenticity verification
  - 1.5. Right to report
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  - 1.7. Transaction proceed refusal
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2. Monitoring Transactions.
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3. Payment methods
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  - 3.3. Address analysis
  - 3.4. Liability
4. Risk Assessment.
5. AML and KYC Policy
  - 5.1. Acceptance
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## **1. Verification procedures.**

**1.1. The basis of the international** standards for the prevention of illegal activities is Know Your Customer (“KYC”). According to the KYC, StarTerra establishes its own verification procedures within the framework of anti-money laundering standards and Know Your Customer.

### **1.2. Identity verification**

StarTerra's identity verification procedure requires the User to provide reliable independent sources of documents, data or information (e.g. ID card, international passport, bank statement, utility bills) every time the User is requested to provide certain information. For AML and KYC Policy purposes, StarTerra hereby reserves the right to collect User information.

**1.3. Anti-money laundering** procedure StarTerra's anti-money laundering procedure requires the User to provide information about the source of the funds the User uses to purchase StarTerra token or any other StarTerra platform partnering project token every time the User is requested to provide certain information. StarTerra is not responsible for any errors or omissions in the information provided by the User.

#### **1.4. Authenticity verification**

StarTerra shall take steps to verify the authenticity of documents and information provided by Users, use all legal methods to double-check identification information and hereby reserves the right to investigate the actions of certain Users that have been found risky or suspicious.

#### **1.5. Right to report**

We may therefore report our suspicions regarding any activity of the users to local regulators, enforcement bodies and other compliance bodies. Those kinds of actions have a goal of ensuring that the capital being used on our platform has a legitimate origin and create a safeguard in case of individuals or groups wanting to allocate their money from illegal activities on our platform.

#### **1.6. Continuous basis of information verification**

StarTerra hereby reserves the right to verify the User's identity on a continuous basis, especially when the verification information has been changed or the User's activity has been deemed suspicious, even if they have already undergone identity verification. User verification information shall be collected, stored, transferred and protected strictly in accordance with StarTerra's Data Protection Policy and the relevant rules. Following the verification of User's identity, StarTerra disclaims potential legal liability in situations where its Services are used for illegal activities.

#### **1.7. Transaction proceed refusal**

StarTerra may refuse to proceed with the transaction of transferring the purchased tokens to the User if the User refuses to provide any demanded information. StarTerra may refuse to issue tokens to the User if:

- a. The User does not provide any demanded information to StarTerra and enables to complete any diligence procedures on the User;
- b. The User has been previously identified as engaged in suspicious activity;
- c. The User is the citizen of a country considered to be exposed to a high risk of money laundering or financing terrorism;
- d. The User is listed on a sanctions list in any of the jurisdictions to which StarTerra may transfer purchased tokens, or StarTerra otherwise identifies the User as exposed to a high risk of money laundering or financing terrorism.

#### **1.8. Payment cancellation.**

The User cannot cancel a request to purchase the tokens. StarTerra may cancel the User's purchase of the tokens if it is impossible to verify User's identity or conduct any other procedures that StarTerra is required to conduct. StarTerra may not refund User any amount until the User has provided any demanded information required by law.

## **2. Monitoring transactions**

#### **2.1 Data analysis**

User verification is carried out not only by checking their identity, but also by analyzing transaction models. StarTerra therefore relies on data analysis as a tool for assessing risk and identifying suspicions. StarTerra carries out many regulatory compliance tasks, including data collection, filtering and record keeping.

#### **2.2 Suspicious transactions reporting**

With regard to the AML and KYC Policy, StarTerra will monitor all transactions, and it reserves the right to ensure that transactions of suspicious nature are reported to the proper law enforcement and request the User to provide any additional information and documents in case of suspicious transactions. StarTerra will monitor User's transactions on a day-to-day basis in order to define whether such transactions are to be reported and treated as suspicious or are to be treated as bona fide.

## **3. Payment methods**

#### **3.1 Terra Station, payment card**

The User may purchase StarTerra tokens or any other StarTerra platform partnering project tokens by linking the Terra Station wallet and managing the cryptocurrency deposit, transferring any cryptocurrency or by card or wire

transfer. To carry out a transaction in a chosen way, the User must follow the relevant instructions on the StarTerra site.

### **3.2 Payment cards usage control**

StarTerra may refuse to complete or block, cancel or reverse a transaction of the StarTerra token or any other StarTerra platform partnering project token purchase made with payment cards usage if the User is suspected of money laundering, terrorist financing, fraud, any other financial crime, or any other illegal action. StarTerra is under no obligation to disclose the details of its credit card risk management and security procedures to the User.

### **3.3 Address analysis**

StarTerra may analyze the cryptocurrency addresses against common black lists and known security discrepancies, to ensure that the funds do not come from illicit sources, and there are no signs of money laundering (location, layers, integration), either manually or using a third-party service.

### **3.4 Liability**

StarTerra has no control over, or liability for, the delivery, quality, safety and legality or any other aspect of any goods or services received or purchased from Terra Station.

## **4. Risk assessment**

StarTerra, in accordance with international requirements takes a risk-based approach to combating money laundering and the financing of the terrorism. By applying a risk-based approach, StarTerra can ensure that measures to prevent or mitigate money laundering and terrorist financing are proportionate with the identified risks. This makes it possible for resources to be allocated in the most efficient way. The principle is to allocate resources corresponding to priorities so that the highest risks are given the closest attention.

## **5. AML and KYC Policy**

### **5.1 Acceptance**

By joining the StarTerra IDO, which is defined as making a StarTerra token or any other StarTerra platform partnering project token purchase in a specific method stated in the clause 3 of this AML and KYC Policy, the User accepts the terms of this AML and KYC Policy and hereby agrees to have read, understood and accepted the Terms of Use and Data Protection Policy available at: [https://app.starterra.io/static/Terms\\_of\\_use.pdf](https://app.starterra.io/static/Terms_of_use.pdf), [https://app.starterra.io/static/Privacy\\_Policy.pdf](https://app.starterra.io/static/Privacy_Policy.pdf) and In addition, when using certain services, the User may be subject to additional agreements applicable to such services. The User must stop using the services and the website if they do not agree with the AML and KYC Policy and the Terms of Use and Data Protection Policy.

### **5.2 Privacy policy**

User's identification information will be collected, stored, shared and protected strictly in accordance with the StarTerra's Privacy Policy and related regulations.