

KYC and AML Policy

1. Policy statement

TCO is committed to complying with relevant global Anti Money Laundering (“AML”) and Terrorist Financing rules, regulations and guidelines. As part of its AML obligations the firm carries out a Know Your Customer (KYC) process with all subscribers/ applicants to meet tis requirements.

2. Scope

This Policy applies to all TCO users.

ThinkMarkets clients may be engaged in ICO investment. ThinkMarkets clients who hold funds on their trading accounts will have to make a new deposit in order to invest in ICO. Transfers from trading accounts will not be accepted.

3. Due diligence

3.1 Individuals

Participants will be required to provide the following information to create a ‘subscription/account’;

- Name
- DOB
- Address
- Source of Funds

3.2 Corporate

Corporates are required to provide the following information:

- Certificate of incorporation
- Memorandum and articles of association
- Shareholders and directors details (including ID and address verifications of significant shareholders e.g. those owning more than 25% equity)

4. Jurisdiction Assessment

The risk profile will be established though an individual/corporates country of residence.

4.1 Standard risk Profile

All countries except for:

- Lebanon
- Burundi
- Congo
- Somalia
- Yemen
- Zimbabwe
- Libya
- Venezuela
- South Sudan



The above are deemed higher risk and will be required to provide three documents (either 1 ID or 2 proof of address or vice versa).

4.2 Sanctions countries

The following countries are known FATF, US, EU sanctions and residents are NOT permitted, however nationals (of these countries) will need to prove permanent residency in the permitted jurisdiction e.g. a North Korean national residing in the UK will need go through enhanced due diligence:

- North Korea
- Syria
- Iran
- Iraq
- Ethiopia
- Burma
- Code d'Ivoire
- Sudan

4.3 Non-participant

Due to domestic regulations, TCO does not deal with residents from the following countries:

- USA
- Canada
- People's Republic of China

However, nationals (of these countries) are allowed if they provide proof of permanent residency in the permitted jurisdiction.

5. Due Diligence

5.1 Simplified Due diligence

Simplified due diligence will be performed on those customers who choose to deposit less than \$US 2,000.

Simplified due diligence will include electronic name check.

TCO will conduct a number of electronic checks, including Peps and Sanctions

- World check
- Trulioo
- GBG

Applicant's names that are drawn on an electronic check may be requested to provide additional data and documentation.

Simplified DD will be also performed on all customers upon deposits..

5.2 Standard Due Diligence

Standard due diligence will be performed on those customers who choose to deposit more than \$US 2,000. Standard DD will be performed only after Token Sale is complete.

The standard due diligence requirement is to provide ID & address verification documentation that matches the name and details on the applicant, is in date government issued (for ID) and can be independently verified. Address verification should be issues within 6 months.

5.3 Enhanced Due diligence

On some occasions, certain applicant segments or applicants may be required to undergo an EDD procedure, to meet this requirement they will be required to provide additional documents e.g. if a Passport has already been provided then a Driving License or national ID card.



5.4 Private Sale

Minimum amount to invest during Private sale is 5 ETH. ICO Investors who participate in Private Sale must go through Standard DD upon investing the funds.

6. Credit card funding

Due to the high-risk nature of ICO investments, funds deposited via credit cards will be fully settled only in 5 months' time. Customers who choose to fund with credit cards will need to be notified that tokens will be issued to them 3 months after Token sale is finished.