

## **Anti-Money Laundering (AML), Counter Financing of Terrorism (CFT), and Know Your Customer (KYC) Policy**

This policy is based on fundamental principles, legal frameworks, regulations, and guidelines designed to combat money laundering and associated criminal activities. Aktien network is dedicated to enforcing robust security protocols and ethical business practices, ensuring adherence to high professional standards while preventing any direct or indirect association with illicit entities.

Aktien network has established a comprehensive Know Your Customer (KYC) framework as a crucial component of its services, risk management, and oversight processes. The KYC framework consists of the following key elements:

**Customer Onboarding** Aktien network maintains strict policies and procedures for customer onboarding, with a focus on identifying individuals and entities that may present elevated risks. Before accepting new clients, thorough KYC and due diligence assessments are conducted, evaluating factors such as the customer's profile, country of residence, public standing, associated accounts, business dealings, and risk exposure. For high-net-worth individuals with ambiguous funding sources, enhanced due diligence is applied. All client funds are processed through reputable banking institutions with stringent anti-money laundering measures. Senior management is solely responsible for approving relationships with higher-risk individuals, such as politically exposed persons. It is important to note that Aktien network does not provide services to U.S. citizens.

**Customer Verification** A fundamental aspect of KYC is verifying customer identities. For the purposes of this policy, a customer refers to any individual or organization maintaining an account with Aktien network, as well as beneficial owners, transaction beneficiaries, or parties involved in high-risk financial activities. Aktien network employs structured verification procedures to confirm customer identities before initiating any business relationship, relying on reliable and tamper-resistant documentation. Special scrutiny is applied to non-resident clients to ensure compliance with verification requirements. The identification process continues throughout the business relationship, with periodic reviews triggered by significant transactions or changes in account activity. If existing customers lack sufficient information, Aktien network takes immediate steps to resolve the compliance gaps.

**Continuous Account Monitoring** In addition to verifying identities, Aktien network actively monitors account activity to detect any deviations from expected transaction behavior. KYC remains integral to the firm's risk management strategy. The level of monitoring and due diligence varies based on the assessed risk associated with each customer.

**Risk-Based Approach** Aktien network adopts a risk-based strategy for its KYC program, implementing specific measures for higher-risk clients based on factors such as background, nationality, financial sources, and transaction patterns. The company ensures that all aspects of customer onboarding, verification, monitoring, and risk assessment align with regulatory standards and industry best practices. This structured approach enables Aktien network to effectively counter money laundering and terrorist financing risks while upholding compliance and minimizing operational and reputational risks.

Aktien network retains the right to request additional documentation from clients at any given time. Customers are required to promptly report changes in ownership or other critical details and provide updated records as needed.

Employee training, internal controls, and fostering a culture of compliance are fundamental to Aktien network's KYC approach. Staff members undergo continuous training tailored to their roles, ensuring that KYC procedures are well understood and correctly implemented across the

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organization. By nurturing a strong compliance culture, Aktien network strives to maintain robust KYC measures throughout its operations.

The company upholds stringent record-keeping practices by maintaining copies of identity verification documents, transaction logs, correspondence, and other relevant records, making them readily available for audits and regulatory inspections.

In conclusion, Aktien network's AML, CFT, and KYC policies highlight its unwavering commitment to combating financial crimes while ensuring a thorough understanding of its customers' identities and financial activities. Through strict adherence to these policies, Aktien network safeguards its operations, protects its clients, and remains fully compliant with applicable legal and regulatory obligations.