

**POLICIES, MEASURES AND CONTROLS FOR THE MANAGEMENT OF RISKS AGAINST
MONEY LAW, FINANCING OF TERRORISM AND FINANCING OF THE PROLIFERATION OF
WEAPONS OF MASS DESTRUCTION**

CRIXTO VENEZUELA, C.A.

Revised version January 15, 2022.

POLICIES, MEASURES AND CONTROLS FOR ML/FT/FPADM RISK MANAGEMENT

1. Annual evaluation of the level of risks of LC/FT/FPADM

CRIXTO VENEZUELA, C.A., in its capacity as Subject regulated by the National Superintendency of Cryptoactives and Related Activities (SUNACRIP), in accordance with the provisions of the **Constituent Decree on the Comprehensive Cryptoactive System**, dated January thirty (30) of 2019, published in the Official Gazette of the Bolivarian Republic of Venezuela No. 41,575; According to **Article 27**, the Exchange Houses "...are part of the Comprehensive System and will be the platform that provides the infrastructure for the secondary trading of crypto assets (...) may exchange a crypto asset for the equivalent in fiduciary currency and/or for another crypto asset.

In the same way, in its **Article 28** regarding the Attributes of the Exchange Houses "... the scope of the activity of the Exchange Houses will be determined by assigning attributes contained in the Operation License granted for that purpose by the National Superintendence of Cryptoactives and Related Activities (SUNACRIP)..."

In accordance with the provisions of **Ruling No. 044-2021** "Rules related to the Administration and Control of Risks related to Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, applicable to Providers of Virtual Assets Services and to the persons and entities that provide products and services through activities that involve Virtual Assets, in the Comprehensive Cryptoactive System" published in Official Gazette No. 42,110 dated April 21, 2021. The Board of Directors of **CRIXTO VENEZUELA, C.A** aware of the risks arising from operations in the Cryptoactive sector has resolved to establish the following:

(i) Formulate, adopt, implement and develop a Comprehensive Money Laundering Risk Management System, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (hereinafter SIAR LC/FT/FPADM).

In accordance with the nature and complexity of its business, financial products and services, the volume of operations, the geographical region where it maintains operations, the available technology and in accordance with the level of its LC/FT/FPADM risks and in compliance with the legal provisions that govern the matter.

a. Design the Risk Management Manual for Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (AR LC/FT/FPADM Manual).

b. Define the SIAR LC/FT/FPADM Structure.

* Board of Directors

* President

*PC LC/FT&FPADM Compliance Officer

c. Adoption "Institutional Commitment" signed by the members of the Board of Directors.

- d. Appointment of a Compliance Officer for the Prevention and Control of LC/FT/FPADM.
- e. Implementation of a Code of Ethics.
- f. Design of an Annual Operational Plan for LC/FT/FPADM PCs and an Annual Training Program for LC/FT/FPADM PCs, aimed at staff on RA LC/FT/FPADM matters.
- g. Design of the initial risk self-assessment.

Based on these criteria, the 1st is presented. Self-assessment of the Risk Level of CRIXTO VENEZUELA, C.A which is shown in the attached matrix:

CRIXTO VENEZUELA, C.A.

AUTOEVALUACIÓN DE RIESGOS						
Nº	VARIABLES DE RIESGO	Referencia	RIESGO (BAJO)	RIESGO (MODERADO)	RIESGO (ALTO)	Calificación
A	CARACTERÍSTICAS DE LA CASA DE INTERCAMBIO DE CRIPTOACTIVOS					
1	Dimensiones de la casa de intercambio de criptoactivos	Cantidad de Sucursales y su ubicación.	De 1 a 10 Sucursales. Pocas ubicadas en zonas de alto riesgo.	Entre 11 y 20 Sucursales. Moderado número de sucursales en zonas de alto riesgo.	Más de 20 Sucursales. Muchas sucursales en zonas de alto riesgo de LC/FT/FPADM.	1
			VALORACIÓN	1	2	
2	Riesgo como Grupo Económico	Composición del Grupo Económico	Las empresas relacionadas integran un Grupo Económico. Todos sus integrantes son entidades reguladas por organismos de supervisión y control y han implementado SIAR LC/FT/FPADM.	La entidad pertenece a un Grupo Económico Integrado principalmente por Empresas financieras y otras no financieras pero de riesgo bajo o moderado.	La entidad pertenece a un Grupo Económico Integrado por otros entes financieros y no financieros pero de riesgo alto riesgo en LC/FT/FPADM.	1
			VALORACIÓN	1	2	
3	Riesgo del Grupo Financiero Internacional	Calidad de los aliados Internacionales	El Exchange forma parte de un grupo Financiero con SIAR LC/FT/FPADM establecidos conjuntamente con prácticas de Buen Gobierno Corporativo. O se trata de un Exchange Local sin entidades aliadas en el extranjero.	Es un Exchange Local pero posee entidades aliadas en otros países, donde destacan Jurisdicciones de alto riesgo.	El Exchange pertenece a un Grupo Financiero que posee subsidiarias o casa matriz en países o territorios de alto riesgo.	1
			VALORACIÓN	1	2	

4	Experiencia en el Sector de Criptoactivos	Calificación de la Directiva de la casa de intercambio de criptoactivos.	Sólida y comprobada Experiencia en el Sector de Criptoactivos	Convergencia de Empresarios de diversos sectores de la economía con banqueros y otros expertos financieros, estos últimos con mayor participación en el control de la entidad.	Empresarios de otros sectores de la economía que emergen en el negocio financiero y Sector de Criptoactivos.	2
		VALORACIÓN	1	2	3	
5	Cartera de Clientes	Dimensión de la Cartera de Clientes con relación a dimensiones de la casa de intercambio de criptoactivos.	Reducida base de Clientes, estables y conocidos. Dimensión acorde al tamaño de la Exchange. Políticas conservadoras de captación.	Aumento moderado de la Base de Clientes. Efectivas Políticas de captación de clientes.	Amplia base de Clientes en comparación con otras Exchange de similar tamaño. Agresivas Políticas de Captación	1
		VALORACIÓN	1	2	3	
6	Clientes o negocios de Alto Riesgo	Proporción de Clientes calificados de Alto Riesgo.	Pocos Clientes o negocios de alto riesgo.	Moderado número de clientes de alto riesgo, como corporaciones off shore, PEP's, Extranjeros no residentes.	Gran número de clientes de alto riesgo, como compañías de importación y exportación, clientes off shore, PEP's y Extranjeros no residentes.	1
		VALORACIÓN	1	2	3	
7	Plataforma Tecnológica	Acceso de la Clientela a los servicios online.	El sitio WEB es solo Informativo y no transaccional.	El Exchange ofrece limitados productos y servicios online (Registro del cliente)	Amplia variedad de productos y servicios vía online (Transacciones de depósitos, intercambios, retiros).	3
		VALORACIÓN	1	2	3	
8	Responsabilidad Social Empresarial (RSE)	Impacto de las acciones de (RSE) emprendidas por la casa de intercambio de criptoactivos.	El Exchange continuamente desarrolla proyectos de (RSE) con alto impacto en el entorno comunitario y en cooperación con el sector público.	El Exchange eventualmente interviene en acciones puntuales de (RSE) con mediano impacto en su entorno comunitario.	El Exchange no desarrolla acciones de (RSE), distintos a los exigidos por Ley.	3
9	Cuentas de Corresponsalía (Fiduciaria)	Cantidad y Calidad de las Cuentas de Corresponsalía.	No posee cuentas con bancos corresponsales en Instituciones financieras extranjeras. Se apoya en otras Instituciones locales para realizar sus operaciones Internacionales.	Pocas cuentas corresponsales, pero que han desarrollado adecuadas políticas de prevención y control LC/FT/FPADM. Las mismas se encuentran ubicadas en Jurisdicciones de bajo riesgo.	Muchas cuentas corresponsales en IIF extranjeras con inadecuadas políticas de prevención y control LC/FT/FPADM y ubicadas en Jurisdicciones de alto riesgo.	1
		VALORACIÓN	1	2	3	
10	Cuentas de Activos Virtuales (Exchanges)	Cantidad y Calidad de las Cuentas de Activos Virtuales.	No posee cuentas con Exchanges extranjeras. Se apoya en otras Exchanges locales para realizar sus operaciones Internacionales.	Pocas cuentas de Activos Virtuales, pero que han desarrollado adecuadas políticas de prevención y control LC/FT/FPADM. Las mismas se encuentran ubicadas en Jurisdicciones de bajo riesgo.	Muchas cuentas de Activos Virtuales en Exchanges extranjeras con inadecuadas políticas de prevención y control LC/FT/FPADM y ubicadas en Jurisdicciones de alto riesgo.	2
		VALORACIÓN	1	2	3	
11	Rotación del Personal clave	Rotación del personal Alta Gerencia; Directores y Gerentes.	Baja rotación	Moderada rotación	Alta rotación	1
		VALORACIÓN	1	2	3	
12	Rotación del Personal de primera línea (base)	Rotación del personal Administrativo y Operativo: Asesores, Analistas.	Baja rotación	Moderada rotación	Alta rotación	1
		VALORACIÓN	1	2	3	
B ADMINISTRACIÓN DE RIESGOS Y CONTROL INTERNO						
13	Evaluación por parte del órgano regulador (SUNACRIP)	Calificación del Órgano de Supervisión y Control. Resultado de la última evaluación en materia de Administración de Riesgo LC/FT/FPADM	Fueron subsanadas las observaciones y tomadas en cuenta las recomendaciones derivadas de la última evaluación, y/o el Exchange no ha recibido inspección en materia de Administración de Riesgo LC/FT/FPADM	Cumplimiento parcial de las recomendaciones derivadas de la última evaluación.	La Junta Directiva del Exchange no se ha pronunciado sobre las observaciones y recomendaciones derivadas del informe de la última inspección recibida.	3
		VALORACIÓN	1	2	3	

14	Función de Auditoría Independiente (Providencia N° 044-2021 según artículos 82, 83, 84, 85, 86 y 87)	Calificación de los Auditores Externos en materia de Administración de Riesgo LC/FT/FPADM	La firma de Auditoría Externa seleccionada es ampliamente reconocida y autorizada por el órgano regulador. * Si fue aplicada Evaluación Independiente.	La firma de Auditoría Externa es ampliamente reconocida y autorizada por el órgano regulador. * No ha sido seleccionada la firma de Auditoría Externa.	La firma de Auditoría Externa es ampliamente reconocida, pero no cuenta con autorización por el órgano regulador. * No ha sido aplicada Evaluación Independiente.	3
		VALORACIÓN	1	2	3	
15	Función de Auditoría Independiente "Informe Anual Sobre PC Riesgos de LC/FT/FPADM" (Providencia N° 044-2021 según artículos 82, 83, 84, 85, 86 y 87)	Resultado de la última evaluación (año 2020) en materia de Administración de Riesgo LC/FT/FPADM	El último Informe Especial Administración de Riesgo LC/FT/FPADM, no refleja incumplimientos de los deberes formales establecidos en las mejores prácticas sobre la materia.	El último Informe Especial de Administración de Riesgo LC/FT/FPADM, refleja incumplimiento de los deberes formales establecidos en las mejores prácticas sobre la materia y se han subsanado sus observaciones y tomado en cuenta las recomendaciones.	El último Informe Especial de Administración de Riesgo LC/FT/FPADM, refleja incumplimiento de los deberes formales establecidos en las mejores prácticas sobre la materia y no se han subsanado sus observaciones ni tomado en cuenta sus recomendaciones. * No ha sido aplicada Evaluación Independiente.	3
		VALORACIÓN	1	2	3	
C ADMINISTRACIÓN DE RIESGO LC/FT/FPADM						
16	Estabilidad de los Actores Ejecutivos del SIAR LC/FT/FPADM (Providencia N° 044-2021 según artículo 12)	Antigüedad de los Actores Ejecutivos del SIAR en sus cargos, incluyendo funcionarios de otras áreas de control.	Estabilidad relativa de todos los actores ejecutivos del SIAR LC/FT/FPADM.	Frecuentes cambios en la Junta Directiva, lo cual genera de igual manera, cambios de otros actores ejecutivos del SIAR LC/FT/FPADM.	Juntas Directiva y Presidente estables, pero cambios frecuentes en el cargo de Oficial de Cumplimiento y personal de la Unidad AR LC/FT/FPADM y otras áreas de Control.	1
		VALORACIÓN	1	2	3	
18	Formación y experiencia del Oficial de Cumplimiento	Nivel Académico, Capacitación y Antigüedad en el cargo del Oficial de Cumplimiento	Profesional Universitario, Comprobada formación nacional y experiencia laboral en Administración de Riesgo LC/FT/FPADM. Experiencia > 5 años.	Moderada formación universitaria y experiencia en Administración de Riesgo LC/FT/FPADM. Experiencia entre 3 y 5 años.	Oficial de Cumplimiento con escasa formación académica y experiencia en la materia. Experiencia < 3 años.	3
		VALORACIÓN	1	2	3	
19	Formación y experiencia miembros del área operativa encargada del análisis, control y detección de operaciones sospechosas de LC/FT/FPADM	Nivel Académico, Capacitación y Antigüedad en el cargo de los miembros del área operativa	Profesionales Universitario, Comprobada formación nacional y experiencia laboral en el área de Activos Virtuales, formación para la Administración de Riesgo LC/FT/FPADM. Experiencia > 5 años.	Moderada formación universitaria, experiencia laboral en el área de Activos Virtuales y experiencia en Administración de Riesgo LC/FT/FPADM. Experiencia entre 2 y 4 años.	Miembros del área operativa con escasa formación y experiencia en la materia. Experiencia < 1 año.	3
		VALORACIÓN	1	2	3	
20	Herramientas Tecnológicas de apoyo para la Administración de Riesgo LC/FT/FPADM	Tecnología disponible para desarrollar las funciones de registro, segmentación, parametrización de señales de alerta, monitoreo en tiempo real, análisis estadístico y variaciones históricas.	Poseen Software anti lavado especializado con reconocidas y amplias bondades en el mercado Cripto financiero.	No poseen Software anti lavado especializado pero han desarrollado herramientas automatizadas internas para el apoyo a la gestión de la Administración de Riesgos LC/FT/FPADM, con bondades para la segmentación.	No poseen Software anti lavado especializado ni han desarrollado herramientas automatizadas internas para el apoyo a la gestión de la Administración de Riesgos LC/FT/FPADM. Procesos manuales, monitoreo aleatorio y hojas de cálculo se utilizan para tales fines.	2
		VALORACIÓN	1	2	3	
21	Política Conozca su Marco Legal	Resultado de las evaluaciones aplicadas al personal.	El resultado de las evaluaciones al personal sobre el marco legal y los elementos del SIAR LC/FT/FPADM es óptimo. Sobre el 70% de aciertos.	El resultado de las evaluaciones al personal sobre el marco legal y los elementos del SIAR LC/FT/FPADM es regular. Entre el 50% y el 70% de aciertos.	El resultado de las evaluaciones al personal sobre el marco legal y los elementos del SIAR LC/FT/FPADM es deficiente. Por debajo del 50% de aciertos.	2
		VALORACIÓN	1	2	3	
22	Capacidad de análisis y detección de transacciones y operaciones inusuales y/o sospechosas	Personal del área de operaciones con relación a las Dimensiones del Exchange	Cantidad de Sucursales + Área Centralizadas Vs. Miembros del área de operaciones = 0 > 10%	Cantidad de Sucursales + Área Centralizadas Vs. Miembros del área de operaciones > 5% y < 10%	Cantidad de Sucursales + Área Centralizadas Vs. Miembros del área de operaciones = < 5%	2
		VALORACIÓN	1	2	3	

23	Calidad de los Reportes de Actividad Sospechosa (RAS) enviados a la UNIF	Total RAS enviados a la UNIF Vs. RAS calificados "A"	Efectividad de los RAS > 60% (ningún RAS)	Efectividad de los RAS entre 31% y 59%	Efectividad de los RAS ≤ al 30%	1
		<i>VALORACIÓN</i>		<i>1</i>	<i>2</i>	
<i>REFERENCIALES:</i>			23	46	69	
TOTAL RIESGO DE LA CASA DE INTERCAMBO DE CRIPTOACTIVOS						42

Nivel de riesgo obtenido de acuerdo a las variables anteriores: **42**

AUTOEVALUACIÓN	
RIESGO:	RANGOS:
Bajo	DE 23 A 38
Moderado	DE 39 A 54
Alto	DE 55 A 69

2. Segmentation by LC/FT/FPADM risk categories

CRIXTO VENEZUELA, C.A., must establish a segmentation by risk categories of LC/FT/FPADM, in accordance with the provisions of **Ruling No. 044-2021** "Rules regarding the Administration and Control of Risks related to Money Laundering , the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, applicable to the Virtual Assets Service Providers and to the persons and entities that provide products and services through activities that involve Virtual Assets, in the Comprehensive System of Cryptoactives" published in Official Gazette No. 42,110 dated April 21, 2021.

Article 36: The Reporting Entity will apply the risk categories in all business areas, taking into account the different LC/FT/FPADM risk factors related to its employees, customers, distribution channels used, business models, products and services offered, structure and size of the entity, use of new or developing technologies, types of virtual assets involved in its operations. These categories are established as: a) Low Risk, b) Moderate Risk and c) High Risk.

Article 37: The Reporting Entity will apply relevant factors or categories that must be considered High Risk, without prejudice to those that may additionally be included and classified in this category, in accordance with the ML/FT/FPADM risk qualification methods of the each Regulated Entity, or as instructed by an authority with competence in the matter, or according to the best international practices for the prevention and control of ML/TF/FPADM; For this purpose, you must consider the following factors or categories, which are mentioned merely by way of example and not exhaustive:

- High Risk Clients and Economic Activities:
- High Risk Products and Services:
- High Risk distribution channels or delivery mechanisms:

- Countries, jurisdictions and geographic areas of High Risk:
- Type of virtual asset involved.

3. Know Your Customer (DDC) Due Diligence Policy

CRIXTO VENEZUELA, C.A., must establish measures and controls for the management of ML/FT/FPADM risks derived from clients, in accordance with the provisions of **Ruling No. 044-2021** "Rules related to the Administration and Supervision of Risks related to Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, applicable to Virtual Asset Service Providers and persons and entities that provide products and services through activities involving Virtual Assets , in the Comprehensive Cryptoactive System" published in Official Gazette No. 42,110 dated April 21, 2021.

Article 39: The Obligated Subjects shall refrain from initiating or maintaining economic relations and providing services or carrying out activities, operations and transactions that involve virtual assets, with natural or legal persons whose identity cannot be fully determined, or who have fictitious names, or with keys or numbers that replace the true identity and it is not possible to establish the real identity of the client or user; They will also not be able to maintain anonymous, unnamed or obviously fictitious virtual accounts and wallets. Likewise, they will refrain from carrying out operations with unidentified occasional users, or when there is suspicion of LC/FT/FPADM, or when they have doubts about the veracity or suitability of the information provided.

The Obligated Subjects must establish by all possible means the true identity of their clients, final beneficiaries and the third parties participating in the activities, services and transactions that involve virtual assets. The Obligated Entities, depending on the nature of their businesses and the risk inherent in their operations, must implement policies, standards, methods and internal controls to adequately and continuously develop a Know Your Customer Due Diligence Policy (CDD), always applying the minimum provisions indicated in this Ruling.

Adequate knowledge of the client will make it possible to reasonably establish their level of LC/FT/FPADM risk, considering factors such as the client's background, their country of origin, whether they hold a relevant position in the public or private sector, the accounts and virtual wallets related parties, business activity or other risk indicators. Based on its own criteria, the Reporting Entity must assess whether a client presents a higher ML/FT/FPADM risk and if there are circumstances that could lead it to establish that certain clients present a lower level ML/FT/FPADM risk. .

It is important that the customer acceptance policy is not too restrictive and ends up denying the general public access to the services of the Obligated Subject.

Article 40: The Obligated Subjects must design and execute effective processes of Due Diligence for the knowledge of the Client (DDC), to establish and maintain commercial relations with their clients, to carry out occasional transactions that involve virtual assets above the minimum threshold of one thousand Euros (1,000 EUR), or when there is suspicion of LC/TF/FPADM, or when there are doubts about the veracity or suitability of the previously obtained customer identification data.

The Customer Due Diligence measures include, among other aspects, identifying the customer and verifying their identity, as well as that of the owner or final beneficiary in the event that the customer is a legal entity. The verification of the identity of the client can be carried out through databases, information or reliable documentation from independent sources.

The Obligated Subjects may apply Due Diligence measures for the identification and verification of the client's identity, not face to face, but rather by corroborating the identity information received from the client (such as name, address, national identification number, date of birth, email, telephone number, for example), with information in public or third-party databases or with information from reliable and independent sources.

The Obligated Subjects may also apply the following Due Diligence measures for Knowing the Client:

- Track the Internet Protocol (IP) addresses of the equipment used by the client and keep a record of said addresses.
- Search the web to corroborate activity information consistent with the customer's transaction profile.
- Examine the transactions carried out throughout the commercial relationship, to ensure that the transactions carried out are consistent with the knowledge of the client, its commercial activity and its risk profile, including, when necessary, the source of the funds involved in operations with virtual assets or crypto assets.
- Carry out the identification of the other parties involved in the operations and that of the occasional users.

The CDD process also includes understanding the ownership and control structure of clients that are legal persons or legal arrangements, as well as understanding the intended purpose and character of the business relationship and obtaining more information in higher risk situations, to increase the degree of knowledge of the client and its activities.

Article 41: For transfers of virtual assets for amounts greater than one thousand Euros (1,000 EUR) or its equivalent, the Reporting Entities must include in them:

- a. Name of the originator and the beneficiary
- b. An account or virtual wallet number for each, when said accounts or virtual wallets are used to process the transaction or in the absence of an account or wallet, a unique reference number of the transaction that allows it to be traced.

- c. The originator's address or his national identity number or the client's identification number or the date and place of his birth.

The Obligated Subjects, when transferring virtual assets for amounts greater than one thousand Euros (1,000 EUR) or its equivalent, must immediately and securely transmit the required information of the originator and the beneficiary. This required information must be submitted simultaneously, or concurrently, with the actual transfer of the virtual asset.

Both the Regulated Entity ordering the transfer, and the Regulated Entity beneficiary of the same, must keep this required information and both must take the measures to freeze without delay funds and virtual assets that are owned or controlled or that are available, directly or indirectly, or for the benefit of persons and entities designated by the United Nations Security Council Resolutions that exhort member states to prevent and suppress the financing of terrorism and the financing of the proliferation of weapons of mass destruction. The UNIF must be informed about the frozen funds and virtual assets, as well as the actions carried out in compliance with said Resolutions.

The Obligated Subjects must not carry out transactions or operations with persons and entities designated by the aforementioned Resolutions of the Security Council of the United Nations Organization.

Since not all transfers of virtual assets involve two Reporting Entities, in those cases in which the transfer involves a single Reporting Entity at either end of the same, the latter must comply with the requirements related to the information required with respect to your customer (the originator or beneficiary, as the case may be).

Article 45: The Obligated Entity will apply the Know Your Client Policy (PCSC) in a differentiated manner, according to the sensitivity and level of risk of LC/FT/FPADM, according to its own risk assessment methods or processes and in consideration to circumstances and risk factors, when the level of risk is:

- a. Stop, it corresponds to an intensified DDC.
- b. Moderate, an improved DDC corresponds to it.
- c. Low, a standard DDC corresponds to it. (...)

Article 46: The Obligated Subject must:

1. Determine the client's risk level at the time the business relationship is established and update it when it considers that there are sufficient elements for it. The universe of clients must be evaluated globally every twelve (12) months, in order to apply the appropriate level of CDD in each case and maintain consistency between the methods or processes applied. The client's rating may be modified at the time that the characteristics of the client experience significant changes with respect to the information provided to the Obligated Subject, either at the beginning of the commercial relationship, as a result of the update carried out by the latter or as a consequence of the change in your transactional profile that has generated the respective alerts.

2. Put into practice appropriate measures and controls to mitigate the potential risk of ML/FT/FPADM, of those clients that have been determined to be High Risk.

3. Establish individual records, in physical or digital form, of each of its clients, in order to obtain and keep updated the information necessary to reliably determine their identification and the economic activities to which they are engaged. Likewise, it must adopt segmentation parameters, in order to define the client's financial profile, so that said profile facilitates the identification of unusual or suspicious operations, and an adequate segmentation will allow determining the range in which the operations are normally carried out. operations carried out by clients and the characteristics of the market in which they participate. (...)

Article 48: The Obligated Subject may carry out the verification of the identity of the client, by means of:

a. Venezuelan and foreign natural persons residing in the country, through the laminated identity card

b. Foreign natural persons not resident in the country, through a valid passport.

c. Legal persons, through:

c1. The Tax Information Registry (RIF) issued by the Integrated National Service of Customs and Tax Administration (SENIAT).

c2. Copies of the constitutive documents of the legal entity, its bylaws and subsequent modifications that are related to its shareholding and control structure, duly registered in the corresponding registry. If the legal entity is constituted outside the national territory, said documents must be legalized and/or apostilled, as appropriate.

Article 50: The Obligated Subject must prepare and maintain, in physical or digital form, a client file with the information consigned by the client, which will contain:

1. For natural persons:

a. Copy of the client's identity card or passport, as appropriate.

b. Customer Identification Sheet.

c. Sworn statement of the lawful origin of the funds or securities represented in their virtual assets, as long as it is not inserted in the body of the Client Identification Sheet.

d. Evidence of the initial and periodic verification actions carried out by the Obligated Subject, in accordance with the level of risk determined for the client.

e. and. Public keys, addresses or customer accounts.

f. Any other document or information related to the client and his activities, which the Obligated Subject deems pertinent.

2. For legal entities:

a. Copy of the constitutive document and the corporate bylaws, duly registered in the corresponding Registry and of its subsequent modifications related to its shareholding and control structure. If the legal person is constituted outside the national territory, said documents must be legalized and/or apostilled, as appropriate.

b. Copy of the Tax Information Registry (RIF).

c. Identification card of the legal person client.

d. Identification card of the natural persons who establish the business relationship on behalf of the legal entity.

e. Sworn statement of the lawful origin of the funds or securities represented in their virtual assets, as long as it is not inserted in the body of the client's identification file.

F. Evidence of the initial and periodic verification actions carried out by the Obligated Subject in accordance with the level of risk determined for the client.

g. Public keys, addresses or customer accounts.

4. Know Your Employee Policy

CRIXTO VENEZUELA, C.A., must establish measures and controls for the management of ML/FT/FPADM risks derived from employees, in accordance with the provisions of **Ruling No. 044-2021** "Rules related to the Administration and Supervision of Risks related to Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, applicable to Virtual Asset Service Providers and persons and entities that provide products and services through activities involving Virtual Assets , in the Comprehensive Cryptoactive System" published in Official Gazette No. 42,110 dated April 21, 2021.

Article 63: The Obligated Subject must formulate and implement the Know Your Employee Policy, which includes the procedures for recruiting and selecting personnel (new hires), verifying the data and information provided by them, as well as references from previous jobs.

The Obligated Subject must prepare and maintain in physical or digital form a file of the employee that will remain in the unit in charge of the management of human talent, which will contain the information required for their entry, as well as:

a. Proof of verification of the data and references provided at the time of establishing the employment relationship.

b. Certificates and supports that evidence the employee's participation in training activities related to the matter of prevention and control of LC/FT/FPADM.

c. Statement of knowledge.

Article 64: When the Obligated Subject has sufficient evidence to consider that any of its employees may be involved in the alleged commission of crimes provided for and sanctioned in our legislation, committed within the framework of its actions related to the employment relationship, it has the obligation to Carry out the complaint procedure established in the regulations that regulate criminal procedure.

The Obligated Subject must carry out the necessary investigations through its Security Management or equivalent Unit and document the investigation as a step prior to the formalization of the complaint.

In this sense, the Human Resources area and the Compliance area will apply the Procedure "applied to the Know Your Employee Policy" in the aspects of selection, file constitution and record keeping (training) respectively.

5. Know Your Related Third Parties Policy

CRIXTO VENEZUELA, C.A., must establish measures and controls for the management of ML/FT/FPADM risks in relation to related third parties, according to the provisions of **Ruling No. 044-2021** *"Rules related to the Administration and Control of Risks related to Money Laundering, the Financing of Terrorism and the Financing of the Proliferation of Weapons of Mass Destruction, applicable to Virtual Asset Service Providers and persons and entities that provide products and services through activities that involve Virtual Assets , in the Comprehensive Cryptoactive System"* published in Official Gazette No. 42,110 dated April 21, 2021.

It is convenient to emphasize, based on the provisions of the **Organic Law Against Organized Crime and Financing of Terrorism**, in its Chapter II On Obligations and Sanctions:

Article 11. Customer identification obligation.

The obligated subjects may not initiate or maintain economic relations with natural or legal persons whose ideality cannot be fully determined. Nor may they maintain anonymous, encrypted, unnamed accounts or accounts with fictitious names, for which the control bodies or entities shall regulate the means deemed appropriate for the identification of the client. Failure to comply with this rule will be sanctioned by the control body or entity of the obligated subject, with a fine equivalent to between five hundred tax units (500 T.U.) and one thousand tax units (1,000 T.U.).

Article 16. Obligation to identify third parties involved.

The obligated subjects must establish by all possible means the true identity of the third parties involved and the final beneficiary. Failure to comply with this rule will be sanctioned by the control body or entity of the obligated subject, with a fine equivalent to between one thousand tax units (1,000 T.U.) and three thousand tax units (3,000 T.U.).

6. REVIEW AND APPROVAL

It is the policy of **CRIXTO VENEZUELA, C.A.**, not to provide access to services, accept assets or carry out any transaction of any kind with respect to any client until

- (i) that client has provided documentation in compliance with the standards established above,
- (ii) the identity of the client has been verified to an appropriate level in accordance with its risk profile, and
- (iii) the client has accepted the relevant terms of business set out above.

In the event that the KYC process described above is carried out as repeat KYC for an existing customer (for example, because it has

Where a suspicion has arisen during the course of a relationship, or because information has come to light that the client's original risk profile has changed), and the client is unable to provide documentation that meets the required standard, the Company will terminate your existing business relationship and consider whether reporting to the Venezuelan authorities is required.

Revised version January 15, 2022.