

Anti-Money Laundering and Know Your Client Policy

CashCart acknowledges that online marketplaces and decentralized payment systems in which payments are processed, validated and secured by a blockchain or distributed ledger technology poses potential risk of illegal use. Indeed all e-commerce marketplace and financial systems are susceptible to criminal abuse. However, CashCart believes that the advantages and legitimate uses of blockchain networks for marketplace and for payments far outweigh these risks. To fully enjoy the advantages of blockchain and leverage the efficiencies brought by the technology, CashCart implements this policy on Anti-Money Laundering (AML), Know Your Client (KYC), Combatting Terrorist Financing (CTF) as well as sanctions monitoring.

By enforcing a strict policy on AML, KYC, CTF and sanctions monitoring, CashCart will be able to assess and manage the peculiar risks associated with cryptocurrencies, enabling the project to focus on building a robust platform and delivering innovative financial services. CashCart has established control mechanisms to manage AML and CTF risks, which are consistent with local laws and regulations as well as international standards set forth by the Financial Action Task Force (FATF).

CashCart is fully committed to comply with the relevant laws and regulations to prevent money laundering and terrorist financing, identify and verify the users of the CashCart Platform as well as the buyers of CCNX tokens. CashCart uses special analytics software to monitor, detect and prevent the use of the platform for money laundering or terrorist financing. CashCart respects and protects the privacy of its users and ICO participants, yet it will not allow the platform or CCNX be used to launder money, or to commit terrorist financing, fraud, financial crimes or any other illegal or nefarious activity.

As guide to implement this policy, CashCart maintains an internal AML KYC Money Laundering Prevention Program. The AML KYC Money Laundering Prevention Program is fundamentally designed to prevent criminal abuse by adhering to international standards set forth by the FATF including the need to have adequate systems and controls in place that would mitigate the risk of being used in facilitating financial crimes. The AML KYC Prevention Program is founded on the best practices for KYC in Mobile Payments and Internet-based Payments Services according to the FATF Guidance on Risk-Based Approach (RBA) issued in 2013 as well as the FATF Guidance on RBA for Virtual Currencies issued in 2015. The AML KYC Prevention Program will be updated periodically to take in consideration the latest typologies report and other relevant guidance notes published by the FATF.

As a basic principle of its KYC policy, CashCart strictly requires identity information received from users and its token purchasers to be corroborated by official documents such as passport or other government IDs, and to be verified by online searches for adverse media, along with the use of other verification tools and techniques.

Regarding its sanctions policy, CashCart strictly prohibits individuals, companies and countries that are named on prescribed sanctions lists from using the CashCart platform or from participating in the ICO. In particular, CashCart will screen against US Office of Foreign Assets Control (OFAC), United Nations, European Union, and other sanctions lists in jurisdictions where the service is

available. This critical policy is implemented through online searches and by using special screening software solutions that will track prospective users or token purchasers who are included in major and relevant sanctions lists.

Cashcart employees and officers receive ongoing broad and principles-based AML/CFT training, as well as position-specific training. They periodically undergo this training at least once every twelve (12) months to ensure they are knowledgeable and in compliance with all pertinent laws and regulations. New employees receive AML/CFT training within sixty (60) days from onboarding. All documentation related to compliance training including materials, tests, results, attendance and date are maintained. In addition, our compliance training program is updated as necessary to reflect current AML laws and regulations.

Updated: 22 January 2019