



**MulTra**  
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**ICO**

## **Know Your Customer and Anti-Money Laundering Policy**

*MulTra - Multiplex Transfer GmbH, Rüsselsheimer Str. 22, 60326 Frankfurt, Germany ("MulTra GmbH") attaches a high degree of importance to the integrity of its business and the MulTra Ecosystem. Therefore we apply strict Know Your Customer ("KYC") and Anti-Money Laundering ("AML") standards before accepting a transfer of ETH as consideration for MTT. Every Participant goes through a verification process in adherence with these policies. Our files will be kept in a way which makes it clear to us and, if requested, to scrutiny by state authorities, who is the actual owner of the transferred amounts in cryptocurrency and the corresponding wallet. We will apply this rule irrespectively of the amount. In case of doubt we will not accept a transfer and turn down the Exchange Request for MTT. Should we conclude that a transfer may be or was made in breach of money laundering or counterterrorism legislation or may be illegal in any other way, we will feel obliged to contact state authorities without being obliged to inform the person or entity having announced or effecting the transfer.*

This Know Your Customer and Anti-Money Laundering Policy (hereinafter "**Anti-Money Laundering Policy**") contains basic information on measures implemented by MulTra GmbH according to the Anti-Money Laundering Act (Gesetz über das Aufspüren von Gewinnen aus schweren Straftaten (Geldwäschegesetz)(hereinafter "**AML Act**"). In order to support the government in the fight against financing of terrorism and money laundering, the Act requires all financial institutions and related service providers to collect, verify and store identity data of persons and entities seeking to establish an account. Correspondingly, based on risk assessment, MulTra GmbH has developed an internal *Anti-Money Laundering Program and Counter Terrorism Financing Program* (hereinafter "**AML Program**") to be aligned with the goals of the AML Act.

These include:

- to detect and deter Anti-Money Laundering and Counter Terrorism Financing;
- to maintain and promote the reputation of the financial system by implementing the recommendations of the German Regulator (Bundesanstalt für Finanzdienstleistungsaufsicht - **BaFin**), where appropriate in the context; and
- to contribute to public confidence in the financial system.

By acquiring MTT for ETH, you accept the following terms and conditions:

- You warrant that you comply with all applicable laws and regulations to combat money laundering, including, but not limited to the AML Act and the associated, currently effective rules and regulations;
- You have no knowledge of and no reason to suspect that:
  - the ETH used to acquire MTT were originated or will be originated and thus were connected and will be connected with money laundering or other activities regarded as illegal within the framework of applicable laws and regulations or other activities prohibited under an international convention or agreement ("**illegal activities**")
  - the proceeds out of your acquisition of MTTs will be used to finance illegal activities; and
- You agree to immediately provide us with all the information that we need to adhere to all applicable laws and regulations to combat money laundering and the financing of terrorism.

In accordance with the AML Program, MulTra GmbH will, upon the receipt of your Exchange Request and on an ongoing basis, exercise due care in accordance with each client's risk levels. This means: in accordance with the legal requirements, MulTra GmbH will

- request a specified set of background information to confirm your identity;
- store this identity-related information as well as the methods and the results of the identity check;
- inform clients that we will request information and reconcile with government-provided lists of terror suspects as far as these are available.

The requested information shall include in particular:

- the full name of the Participant; and
- the date and place of birth if it is a natural person; and
- the address or registered office of the customer; and
- the company name or the customer's registration number.

MulTra GmbH reserves the right to ask for additional information, in particular referring to

- the expected source of funds, which are intended to be used in the business relationship; and
- details about employment and assets or sources of income; and
- if the person receiving the MTT is not the customer himself, the relationship of the person with the customer.

To verify the above information, MulTra GmbH will request the following documentation from prospective clients:

**For private individuals:**

- **passport** or **identity card** or similar document that:
  - includes name, date of birth and a photograph of the person to whom the document is issued, and
  - is issued by a national government, the United Nations or an agency of the United Nations.

**For corporates:**

- company's **name** and address
- company's **registration number**
- copy of the **certificate of incorporation** or equivalent national document;
- copy of the **bylaws** or equivalent national document;
- proof of identity of the directors, i.e. the information requested from individual participants.
- MulTra GmbH might request additional documentation and background information. In some instances, copies of requested documents may suffice, provided they have been officially certified and appraised.
- In case a Politically Exposed Person ("PEP"), i.e. an individual who is or was entrusted with prominent public functions, additional rules may apply. MulTra GmbH, therefore, might, ask for additional information. The same holds true in case family members or close associates of PEPs are involved.

**Updates to this Anti-Money Laundering Policy**

This Anti-Money Laundering Policy may be revised, modified, updated and/or supplemented without giving reasons, at any time, without prior notice, at the sole discretion of MulTra GmbH. When we make changes to this Policy, we will notify all users on our Website, and make the amended Policy available on our Website. In case you do not accept the amendments, you may not further use the services of MulTra GmbH.

**Contact us**

Please contact us with questions, comments, or concerns (including to make a complaint) regarding our Anti-Money Laundering Policy and/or practices at:

[contact@multra.io](mailto:contact@multra.io)