

## **Bravia AML/KYC Policy**

1. **Bravia Inversiones y Gestiones, S.L.**, a company incorporated in Spain (hereinafter “Bravia”), Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML/KYC Policy”) is designated to prevent and mitigate possible risks of Bravia being involved in any kind of illegal activity.

2. Both international and local regulations require Bravia to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Members.

### **VERIFICATION PROCEDURES**

3. One of the international standards for preventing illegal activity is customer due diligence (“CDD”). According to CDD, Bravia establishes its own verification procedures within the standards of anti-money laundering and “Know Your Customer” frameworks.

4. Bravia identity verification procedure requires the Member to provide Bravia with reliable, independent source documents, data or information (e.g., national ID, international passport, bank statement, utility bill). For such purposes Bravia reserves the right to collect Member’s identification information for the AML/KYC Policy purposes.

5. Bravia will take steps to confirm the authenticity of documents and information provided by the Members. All legal methods for double-checking identification information will be used and Bravia reserves the right to investigate certain Members who have been determined to be risky or suspicious.

6. Bravia reserves the right to verify Member’s identity in an on-going basis, especially when their activity seemed to be suspicious (unusual for the particular Member). In addition, Bravia reserves the right to request up-to-date documents from the Members, even though they have passed identity verification in the past.

7. Member’s identification information will be collected, stored, shared and protected strictly in accordance with the Bravia Privacy Policy and related regulations.

8. Once the Member’s identity has been verified, Bravia is able to remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity.

### **ANTI-MONEY LAUNDERING POLICY**

9. Bravia enforces a strict anti-money laundering policy with zero tolerance for money laundering activities. We define money laundering as any activity that is carried out in an attempt to misrepresent the source of funds actually acquired through illegal processes as funds that were acquired through lawful sources/activities.

10. Bravia ensures complete compliance with laws pertaining to anti money laundering through its related policy.

11. Bravia implements a range of filtration operations for swift and accurate identification of any financial activities that may constitute or are related to money laundering. This helps ensure a money laundering-free financial operations throughout the Bravia.Club.

12. All Members Bravia.Club acknowledge, undertake and agree to the following terms regarding their Membership in Bravia.Club:

1) The Member will comply) with all relevant statutes pertaining to money laundering and proceeds from criminal activities.

2) Bravia operates under certain obligations known as “know-your-client” obligations which grant Bravia the right to implement anti-money laundering procedures to help detect and prevent money laundering activities where money laundering may mean to handle any funds associated with any illegal activity regardless of the location of such activity.

3) The Member agrees to lend full cooperation to Bravia with respect to anti-money

laundering efforts. This involves providing information that Bravia requests regarding the Member's business details, account usage, financial transactions etc. to help Bravia perform its duties as dictated by Applicable laws regardless of jurisdiction.

5) Bravia has the right to use Member's information for the investigation and/or prevention of fraudulent or otherwise illegal activities.

6) Bravia has the right to share Member's information with:

a) Investigative agencies or any authorized officers who are helping Bravia comply with applicable law, including anti-money laundering laws and know-your-client obligations;

b) Organizations that help Bravia provide the services it offer and Privileges to its Members;

c) Government, law enforcement agencies and courts, including regulatory bodies and financial institutions.

13. Activities that Bravia considers possible indications of money laundering include:

1) The Member showing unusual apprehension or reservations about Bravia's anti-money laundering policies.

2) The Member failing to provide legitimate sources for their funds.

3) The Member providing false information regarding the source of their funds.

The above list is by no means an exhaustive list. Bravia monitors Members activity in light of several other red flags and takes appropriate measures to prevent money laundering.

#### **KNOW YOUR CUSTOMER (KYC)**

14. The Member acknowledges that he/she/it has to complete a KYC check to become a Member of Bravia.Club, which must be in form and substance satisfactory to the Bravia.

15. During the Member's account registration process Member shall provide the following identification information to the Bravia:

1) Member's full name;

2) Member's date and place of birth and the place of residence or seat;

3) Country of residence/location of Member;

4) Mobile telephone number and e-mail.

16. After receiving the identification information, the Bravia's staff should verify this information requesting the appropriate documents. Appropriate documents for verifying the identity of Member include, but are not limited to, a high resolution scanned copy or photo of pages of a passport or any other national ID, indicating family name and name(s), date and place of birth, passport number, issue and expiry dates,

17. To verify proof of address of the Member Bravia requires one of the following to be provided, in the same correct name of the customer: a high-resolution copy of a utility bill (fixed-line phone, water, electricity) issued within the last 3 months; A copy of a tax or rates bill from a local authority; A copy of a bank statement (for a current account, deposit account or credit card account); A copy of a bank reference letter.

18. The Member is obliged to collaborate with regard to the AML/ KYC check and to provide any information and document deemed necessary by Bravia.

19. Bravia may reject any Member in its sole discretion after the without being obliged to disclose any reason for the rejection.

20. In case the automatic procedures fail, the Bravia shall contact the Member by email or other means to obtain the information and documents needed. In case the Member does not provide the

documents in the requested form and any other information requested to satisfy the AML/KYC check within 10 (ten) days which are not public holidays of the Bravia's request, Bravia may reject the Member and the costs for the AML/KYC check will be at the cost of the Member. Additionally, Bravia has the right to partially or fully withhold the received amounts for any costs or damages incurred by Bravia. All kind of remittance fees either for fiat currency or for crypto currencies shall be borne by the Member.