

ITRUE AML POLICY

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1. iTrue Limited that is a company incorporated in Hong Kong. Anti-Money Laundering and Know Your Customer Policy (hereinafter - the “AML Policy”) is designated to prevent and mitigate possible risks of iTrue being involved in any kind of illegal activity.

2. Both international and local regulations require iTrue 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 Users.

VERIFICATION PROCEDURES

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

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

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

6. iTrue reserves the right to verify User’s identity in an on-going basis, especially when their identification information has been changed or their activity seemed to be suspicious (unusual for the particular User). In addition, iTrue reserves the right to request up-to-date documents from the Users, even though they have passed identity verification in the past.

7. User’s identification information will be collected, stored, shared and protected strictly in accordance with the iTrue Privacy Policy and related regulations. More detailed information regarding safe measures, regarding information on how we store, disclose, erase Personal Data, what obligations do You bear and what rights do You have, can be found in the iTrue Privacy Policy. Detail description of KYC Policy is given in iTrue Privacy Policy.

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

COMPLIANCE OFFICERS

9. The Compliance Officers are the persons, duly authorized by iTrue, whose duty is to ensure the effective implementation and enforcement of the AML Policy. It is the Compliance Officer's responsibility to supervise all aspects of iTrue anti-money laundering and counter-terrorist financing, including but not limited to:

- a. Collecting Users' identification information.
- b. Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations.
- c. Monitoring transactions and investigating any significant deviations from normal activity.
- d. Implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs.
- e. Updating risk assessment regularly.
- f. Providing law enforcement bodies and other competent authorities with information as required under the applicable laws and regulations.

10. The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

ANTI-MONEY LAUNDERING POLICY

11. iTrue 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.

12. All iTrue affiliates are obligated to comply with iTrue anti-money laundering policy and with all applicable anti-money laundering laws. Failure to comply can result in severe consequences such as criminal penalties and

heavy fines.

13. iTrue ensures complete compliance with laws pertaining to anti money laundering through its related policy.

14. iTrue 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 iTrue.

15. All ITU Tokens Purchasers acknowledge, undertake and agree to the following terms regarding their use of ITU Tokens, opening and maintenance of accounts at iTrue and for all financial transactions as a iTrue client:

1) The Purchaser will comply (throughout the time as a iTrue client) with all relevant statutes pertaining to money laundering and proceeds from criminal activities.

2) iTrue operates under certain obligations known as “know-your-client” obligations which grant iTrue 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 Purchaser agrees to lend full cooperation to iTrue with respect to anti-money laundering efforts. This involves providing information that iTrue requests regarding the client’s business details, account usage, financial transactions etc. to help iTrue perform its duties as dictated by Applicable laws regardless of jurisdiction.

4) iTrue reserves the right to delay or stop any funds transfer if there is reason to believe that completing such a transaction may result in the violation of any applicable law or is contrary to acceptable practices.

5) iTrue reserves the right to suspend or terminate any account or freeze the funds in an account if there is reason to believe that the account is being used for activities that are deemed unlawful or fraudulent.

6) iTrue has the right to use client information for the investigation and/or prevention of fraudulent or otherwise illegal activities.

7) iTrue has the right to share client information with:

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

b. Organizations that help iTrue provide the services it offer its clients.

c. Government, law enforcement agencies and courts.

d. Regulatory bodies and financial institutions.

17. Activities that iTrue considers possible indications of money laundering include:

1) the client showing unusual apprehension or reservations about iTrue's anti-money laundering policies;

2) the client's interest in conducting financial transactions which are contrary to good business sense or are inconsistent with the client's business policy;

3) the client failing to provide legitimate sources for their funds;

4) the client providing false information regarding the source of their funds;

5) the client having a history of being the subject of news that is indicative of civil or criminal violations;

6) the client seems to be acting as a 'front man' for an unrevealed personality or business, and does not satisfactorily respond to requests for identifying this personality or business;

7) the client not being able to easily describe the nature of his/her industry;

8) the client frequently makes large deposits and demands dealing in cash equivalents only;

9) the client maintains multiple accounts and conducts an unusually high number of inter-account or 3rd party transactions;

10) the client's previously usually inactive account starts receiving a surge of wire activity;

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