

### **Information on the internal policy adopted by Bitcan sp. z o.o. on anti-money laundering.**

Money laundering (money laundering) - is an activity aimed at bringing into legal circulation money or other assets obtained from illegal sources or used to finance illegal activities. In most cases, it involves drug crime, terrorism or other organized criminal activities.

The administrator of the Bitcan.pl website has been designated as a compulsory institution under the Act of March 1, 2018 on the prevention of money laundering and terrorist financing, hereinafter referred to as the Act. The Polish Law implements the Directive of the European Parliament and of the Council (EU) Directive 2018/ 843 of May 30, 2018 on the prevention of the use of the financial system for money laundering or terrorist financing and the recommendations of the Financial Action Task Force (FATF) on the aforementioned issues

Bitc an sp. z o. o. takes all measures required by law to ensure the transparency of trading and to ensure the prevention of money laundering using the Service.

1. implementation of an internal procedure specifying the rules of conduct of the site to ensure compliance with the obligations indicated in the Act. The procedure is an internal document, and the Administrator of Bitcan.pl website undertakes to exercise due diligence by controlling the proper application of the procedure by the employed persons;
2. Ensure that those performing AML duties participate in relevant training programs;
3. identification and assessment of the risks associated with the possibility of using the site's activities for money laundering purposes, updated as necessary;
4. The application of financial security measures to users of the Service, including user identification. The scope of application is determined on the basis of an assessment of the risk of money laundering and terrorist financing made as a result of the analysis, taking into account, in particular, the type of Service user, business relations, products or transactions. The conditions for the application of financial security measures are detailed in § 7 of the Terms of Service. Detailed conditions for identifying and verifying the identity of Users are set forth in § 4 of the Terms of Service
5. keeping the relevant records for at least 5 years from the date of registration of the transaction in question.  
Detailed conditions for storing personal data are specified in the Privacy Policy of the website.
6. Providing the General Inspector of Financial Information (GIIF) with information on circumstances that may indicate a suspicion of a money laundering or terrorist financing crime, as well as a reasonable suspicion that a specific transaction or property values may be related to such a crime. We are talking about a single transaction or when transactions are carried out through more than one operation, the circumstances of which indicate that they are related to each other and have been divided into operations of lesser value with the intention of avoiding the obligation to

registration; In addition, the Administrator of the Bitcan.pl website is obliged to provide information about the accepted deposit or made withdrawal of funds with an equivalent of more than EUR 15. 000;

7. stopping transactions in accordance with the provisions of the Law and guidelines received from the GIIF, in connection with a reasonable suspicion of a money laundering or terrorist financing offense;
8. to cooperate directly with law enforcement agencies, in particular with the prosecutor's office, in the event of a reasonable suspicion that a certain transaction or certain assets may be related to a crime other than money laundering or terrorist financing.
9. All actions taken to carry out the above duties shall be in accordance with generally accepted good practices and applicable laws, in particular those concerning the protection of personal data.

The administrator of the Bitcoin.pl website is subject to control by the GIIF or the Customs and Revenue Service in fulfilling its obligations as an obligated institution.

At the same time, we would like to inform you that in case of any state authority or any other institution established on the basis of an international agreement, to which Poland is a party, directing Bitcan sp. z o.o. to make any kind of a ruling, which implies an obligation to keep or transfer to the deposit account of the aforementioned institution virtual currencies of the User, the account of this User may be suspended until the virtual currency units accumulated on it may be transferred to the aforementioned deposit account or their withdrawal may be blocked for the time of their existence in circulation. In such case Bitcan sp. z o.o. will notify the User about the reason for blocking access to his/her funds within 7 days from the date of blocking. Bitcan sp. z o. o. has the right to make User's data available to the above-described institutions at the express request of relevant authorities or offices and upon presentation of relevant required documents. Bitcan sp. z

o.o. reserves the right not to execute transactions with entities on sanction lists maintained by relevant anti-money laundering institutions, in particular within the framework of the United Nations, the European Union.

Thus, any suspicion of non-compliance of the Service or its Users with applicable laws and regulations should be immediately reported to the Administrator at [kontakt@bitcan.pl](mailto:kontakt@bitcan.pl).

Detailed conditions for the operation of the Service and the conduct of transactions and their security are set forth in the Terms of Service.

This internal policy is applied as of 05/07/2019.