

NEPT METaverse | AML, CFT & KYC Policy

Effective Date: 15th April 2022

INTRODUCTION

Having regard for the safety of the users of our web platforms (i.e., www.metanept.io and Nept tokens/NFTs related investor dashboards and landing pages) and due to the legal requirements of the British Virgin Islands, we have implemented and started to use the relevant customer's identification (KYC) and combating money-laundering and terrorist financing (AML/CTF) policies and practices that are brief hereof.

The purpose of practising the policies briefed hereof is to effectively combat money laundering and terrorist financing on our web platforms by proper identification of actual users of our accounts and supervision of their transactions. We shall identify and cease transactions made with the intention of concealing the criminal origin of money, financing illegal activity or other unlawful behaviours.

Specific provisions of our policies are confidential and for internal use only, in order to prevent their avoidance by dishonest or fraudulent users. We would like to introduce to you some of the general rules and stipulations of our policies that directly concern you and affect the services we render.

Throughout these terms, the regulations pertaining to AML/CTF and related KYC requirements that are applicable in the British Virgin Islands shall be referred to as "BVI AML/CTF Regulations and Policies". These include the Anti Money Laundering Regulations, the Anti Money Laundering and Terrorist Financing Code of Practice and any other applicable laws and policies.

USER IDENTIFICATION – INDIVIDUALS

In the first place we are obliged to identify, beyond a reasonable doubt, the identity of persons enabled to do transactions on our web platforms. This is the reason why we collect ID scans, whose authenticity is verified with the special software of professional external providers. We require sending a "selfie" or your recording with an ID document in order to preclude the possibility of using your documents by someone else. Verification of your likeness to the photo from your ID is made with the use of special software of professional external providers or, in case of doubts, done manually by our customer support services. In case of any doubts, our customer support team will contact you to explain any concerns and solve the issues that arose. If we cannot determine, beyond a reasonable doubt, that the documents you provided belong to you and are authentic we won't be able to let you execute any transactions. As a part of the identification process, we shall require you to provide your full name (including any other names or aliases) and your physical address. We shall maintain a record of our verification of your identity. The identification, verification process and maintenance of records of the same shall be done in compliance with the British Virgin Islands' Data Protection Act, 2021 in addition to the BVI AML/CTF Regulations and Policies.

USER IDENTIFICATION – CORPORATE ENTITIES

In the case of all juristical entities (companies), the procedure is more stringent and depends on the company's structure, country of incorporation, etc. Primarily, we need to establish who is the owner of the company, who can represent it, where the company is based and what is the business of the company. Since standards regarding governmental documentation of legal

entities are different in each country, verification of such users has to be carried out “manually” and is considerably more time-consuming. Companies shall be required to provide details of their physical address. We shall maintain a record of our verification of the company’s identity. The identification, verification process and maintenance of records of the same shall be done in compliance with the British Virgin Islands Data Protection Act, 2021 in addition to the BVI AML Regulations and Policies.

MAINTENANCE OF RECORD OF TRANSACTIONS AND REPORTS

We shall maintain a record of all transactions carried out by you or on your behalf. Such records shall be maintained for at least five years from the date of completion of each individual transaction, series of linked transactions and in case you cease to be a user of the NEPT Metaverse, for at least five years from the date you cease to be a user. We shall maintain all such records as long as we are required to do so for the purposes of any Anti Money Laundering Investigation as well. We shall maintain a record of all reports made by us to the Financial Investigation Agency for Money Laundering and all inquiries received by us from the Agency, as well as a register of the same.

TRANSACTIONS MONITORING AND SUPERVISION

Using proprietary software of professional external providers, we also analyse all crypto transactions that take place on our web platforms looking for suspicious and unusual behaviour. Such selected transactions are analysed by our AML compliance specialists and/or software systems and evaluated to determine whether they hold significant AML/CTF risks or need to be ceased and clarified with the User.

ADDITIONAL VERIFICATION

When your transactions within our platform rise, our AML/CTF verification duties increase as well. The same happens when your transactions are “flagged” as suspicious or unusual, or our verification of your identity results in qualifying you as a person imposing significant AML/CTF risk. In such cases, we may require you to provide additional documents proving your real, exact place of residence, education, occupation, as well as source of money/assets you are using on our web platforms. Unfortunately, If our AML specialists or compliance software systems decide that the information received from you doesn’t clarify our doubts, we will be legally obliged to remove you from our web platform or even report your transactions to relevant authorities. All such verification shall be carried out in accordance with the British Virgin Islands Data Protection Act, 2021.

BASIC AML/CTF RULES

Our operating rules include inter alia as follows:

1. We do not accept any third party to make deposits in a user’s account, manage a user’s account on their behalf, or for users to operate joint or shared accounts with others.
2. We do not allow any exceptions in the field of documentation required from users.
3. We reserve the right to refuse to process the User’s transaction at any time, in case of suspicion of AML/CTF risk.
4. In accordance with the concerned laws, we are not obliged (or even forbidden) to inform our clients, if we report their behaviour as suspicious to the concerned authorities.

MONEY LAUNDERING REPORTING OFFICER

Our Money Laundering Reporting Officer shall ensure compliance with all laws relating to money laundering and terrorist financing enacted in the British Virgin Islands. The concerned officer can be contacted at compliance@metanept.io.

SANCTIONED COUNTRIES

In accordance with our policies we do not open accounts and do not process transactions for citizens and residents of, as well as people staying in, countries where transactions are prohibited by international sanctions or their internal law regulations.

KYC VERIFICATION

When your trade volume rises AML/CTF risk increases as well. That is why we have to introduce proper safety and verification procedures. As a result, we introduced a verification system, based on the general rule that the more cryptocurrencies you deposit or want to withdraw the more information about you and your funds we need to exclude AML/CTF risks (as we are required by law). Our current verification model is:

Transaction Method	Cryptocurrency
Transaction Limit	Unlimited
KYC requirements	ID verification and Address data

You should remember that this model is a result of the work and experience of our AML team and can be changed in accordance with requirements as per the laws in British Virgin Islands or other applicable international laws or as a result of changes in facts and circumstances.