

## **Anti-Fraud Policy**

### **1. General Provisions**

This Anti-Fraud Policy is an integral part of our Terms of Use.

Effective Global Solutions UAB, a company incorporated under the laws of the Republic of Lithuania under registration number 305970282, registered and located at Vilnius, Eišiškių Sodų 18-oji Str.11, Lithuania (“Neocrypto”, “we”, “us”) have a ‘zero tolerance’ policy towards fraud, collusion, money laundering, financing of terrorism and other criminal conduct (“prohibited conduct”) and will thoroughly investigate and seek to take disciplinary and/or legal action against those who perpetrate, are involved in, or assist with fraudulent or other improper actions in all Neocrypto activity and related transactions.

Neocrypto will provide adequate and appropriate resources to implement the Anti-Fraud Policy and will ensure it is communicated and understood.

### **2. Key Responsibilities**

Neocrypto performs a “Know-Your-Customer” (KYC) due diligence on its Clients and a due diligence on all transactions in order to detect possible compliance or integrity concerns. Such due diligence is performed in accordance with the requirements of the money laundering and terrorist financing activities laws and regulations of the Republic of Lithuania.

In view of the Anti-Fraud Policy, Neocrypto is responsible for:

- ensuring efficient and effective systems, procedures and internal controls are in place to enable the prevention and detection of prohibited conduct;
- ensuring all relevant staff members have a duty to report any internal and external suspicions or incidents of prohibited conduct;
- reviewing continuously its systems, procedures and internal;
- reporting any suspicions regarding prohibited conduct to the relevant state authorities.

### **3. Fraud Prevention and Investigation**

Neocrypto’s anti-fraud and anti-money laundering (AML) teams ensure detection, investigation and protection in preventing prohibited conduct through the Clients and transactions appraisal process.

The teams, working in close collaboration with the nominated Compliance (AML) Officer, shall be responsible for:

- receiving reports of alleged or suspected prohibited conduct involving Neocrypto, its Clients and/or related transactions;
- investigating such matters;
- reporting its findings to the Neocrypto management and relevant authorities, as well as any other third party on a need-to-know basis.

All prohibited conduct investigations conducted by the Neocrypto’s teams shall be fair and impartial, with due regard to the rights of the Clients and persons or entities involved. The presumption of innocence applies to those alleged to have engaged in misconduct. Those involved in the prohibited conduct investigation (be those under investigation or those conducting the investigation) should be aware of their rights and obligations and ensure they are fully respected.

All Clients are required to cooperate with the Neocrypto's staff promptly, fully, efficiently and in the manner, including by answering relevant questions and complying with requests for information and records.

#### **4. Miscellaneous**

Neocrypto will review the Anti-Fraud Policy to reflect new legal and regulatory developments and ensure good practice.

BY ACCESSING NEOCRYPTO'S SERVICES, YOU WARRANT AND GUARANTEE THAT YOU HAVE NO INTENTION TO COMMIT ANY OF PROHIBITED CONDUCT ACTS DESCRIBED HEREIN; FURTHERMORE, YOU CONSENT TO ANY CHECKS DUE TO INVESTIGATION UNDER THE ANTI-FRAUD POLICY AND YOU AGREE TO COOPERATE FULLY AND PROMPTLY WITH THE NEOCRYPTO TEAMS WITHIN SUCH INVESTIGATION.