

AML / KYC Policy

Blockdaemon Inc., and its subsidiaries and affiliates, including but not limited to Blockdaemon Ltd. (together, “Blockdaemon” or “Company”), is the largest blockchain infrastructure as a service provider, supporting 60+ blockchain networks, offering customers (“Customers”) with a secure, scalable and easy-to-use solution for their staking, node infrastructure, and development needs. Our mission is to drive institutional adoption and ease of access to blockchain networks with enterprise-grade security and enhanced monitoring.

Blockdaemon’s Anti-Money Laundering and Know Your Customer Policy (the “AML/KYC Policy”) is designed to actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or any other criminal or illicit activities in connection with Blockdaemon’s operations and assets.

Blockdaemon takes a proactive risk-based approach to combating fraud, sanctions violations, money laundering, terrorist financing, corruption and bribery. By adopting this risk-based approach, Blockdaemon is able to ensure that measures to prevent or mitigate these crimes are proportional and reasonable to the identified risks. Blockdaemon believes that resources should be directed in accordance with priorities so that the greatest risks receive the highest attention. The AML/KYC policy is designed to follow international and domestic regulations and to implement effective internal procedures and systems to prevent fraud, sanctions violations, money laundering, terrorist financing, corruption and bribery, and will take appropriate action when it discovers any form of suspicious activity from its customers.

Below are the measures we take to ensure Blockdaemon products and services are safe and compliant with applicable international regulations:

- Blockdaemon has a trained compliance team that serves to ensure that Blockdaemon is compliant with all legislations, regulation, rules, and industry guidance to prevent criminal activity, including but not limited to money laundering and terrorist activity.
- Blockdaemon has a board appointed Compliance Officer to ensure the effective implementation and enforcement of the AML/KYC Policy. It is the Compliance Officer’s responsibility to supervise all aspects of Blockdaemon’s anti-money laundering and counter-terrorist financing programs.
- Blockdaemon is prohibited from transacting with individuals, entities and countries that are on prescribed sanctions lists, and screens against United Nations, European Union, UK Treasury and US Office of Foreign Assets Control (OFAC) sanctions lists in all jurisdictions in which we operate.
- Blockdaemon requires all new customers to adhere to our Know Your Customer (KYC) policies and processes prior to being onboarded to ensure we securely collect information to verify the identity and ownership of all our customers and industry partners. For this purpose Blockdaemon explicitly reserves the right to confidentiality to collect User’s identification information for the purpose of AML/KYC procedures.

- Blockdaemon's compliance team conducts customer due diligence provisions on all customers at the point of onboarding as well as through periodic account review that includes checks for sanctioned parties, Politically Exposed Persons and suspicious activity. Customers that are determined to be high risk undergo enhanced due diligence procedures and are reviewed on an increased periodic basis. Blockdaemon reserves the right to verify User's identity on an on-going basis, especially when their identification information has been changed or their activity is flagged as suspicious.
- Blockdaemon monitors transactions and reports suspicious activity to ensure that relevant authorities are notified in the event Blockdaemon compliance staff discovers activities of concern. Blockdaemon relies on advanced data analysis from a variety of compliance-related tools that capture, filter, analyze and report data to the compliance team for review and action.
- Prior to hiring any employee, the Company will require sufficient documentation and background checks to ensure the identification and moral character of its employees. Additionally, all Blockdaemon employees receive required compliance training at the point of onboarding as well as periodically to raise awareness of the importance of these policies and programs to the broader company mission.
- Blockdaemon is continually improving by undertaking periodic risk assessments to identify new or changing risks associated with our specific business activities, and develop appropriate mitigating internal controls.