



マネーロンダリング防止ポリシー

**ANTI-MONEY LAUNDERING
(AML) POLICY**

This AML Policy outlines the commitment of Seikum or the "Company" to adhere rigorously to all applicable anti-money laundering (AML) and countering the financing of terrorism (CFT) laws and regulations. The Company undertakes a comprehensive range of measures aimed at detecting unlawfully obtained funds and implementing measures to prevent their legitimization, in accordance with international requirements.

1. IDENTIFICATION AND VERIFICATION OF CLIENTS

1.1. Pursuant to AML and KYC (Know Your Client) policies, the Company shall establish the identity of the Client and verify their true identity both at the commencement of the business relationship and on an ongoing basis.

1.2. During the registration process, the Client shall furnish the Company with identification information, including the Client's full name, date of birth, country of residence, mobile number, and email.

1.3. Upon receipt of identification information, the Company is obligated to verify the provided information by requesting the appropriate documents.

1.3.1. The appropriate document for verifying the Client's identity may include a high-resolution scanned copy or photograph of a passport, driving license, or any other national ID.

1.3.2. The appropriate document to verify proof of address is a high-resolution copy or photograph of a utility bill or a bank reference issued within the last three months.

1.4. Upon the Company's request, the Client is required to provide a scanned copy or photograph of both the front and back sides of their credit/debit card. The front side should display the cardholder's full name, expiry date, and the first six and last four digits of the card number. The back side should show the cardholder's signature, with the CVC2/CVV2 code securely covered.

1.5. The Company shall regularly monitor Client due diligence and accounts to assess the level of risk they pose and identify any changes in the Client's information.

1.6. In situations where the Company believes that the business relationship with the Client may pose a potentially high risk of money laundering or terrorism financing, the Company reserves the right to request additional data and documents as deemed necessary.

1.7. The Client is required to promptly inform the Company of any changes in their personal or contact information.

2. PAYMENT POLICY

- 2.1. To mitigate the risk of money laundering and terrorism financing, the Company strictly prohibits the acceptance or disbursement of cash payments under any circumstances.
- 2.2. The Company retains the authority to decline the processing of any transaction at any stage if there are reasonable suspicions of a connection to money laundering or criminal activity.
- 2.3. In accordance with international legislation, the Company is prohibited from informing the Client if they have been reported for suspicious account activity.
- 2.4. Deposits must be made in the name of the same person as recorded in the Company's records. Third-party payments are not accepted.
- 2.5. The Company enforces a rigorous adherence to established deposit and withdrawal procedures. Funds can only be withdrawn to the same account and using the same method as when depositing. When withdrawing funds, the payee's name must match the Client's name in the Company's records. For deposits made via wire transfer, withdrawals must be initiated via the same transfer to the same bank and bank account. For deposits made through payment systems, withdrawals shall be conducted through online transfers to the same payment system and account used for deposit.
- 2.6. Compliance with the AML policy mandates that fund withdrawals be executed in the same currency as the deposit.
- 2.7. The Company maintains transaction records for a minimum of five years following the termination of the business relationship with the Client.

3. PERSONNEL TRAINING

- 3.1. The Company designates an AML Compliance Officer who assumes full responsibility for ensuring the Company's compliance with CFT and AML policies, establishing and maintaining the Company's AML program, conducting AML training for employees, receiving, investigating, and maintaining internal suspicious activity reports.
- 3.2. All employees, managers, and directors of the Company undergo thorough vetting upon employment.
- 3.3. Employees involved in client interactions or engaged in any AML checks, verification, or monitoring receive AML training. New employees are required to complete an AML training program, which encompasses training on the identification of suspicious transactions, as well as prevention, detection, and reporting of money laundering and terrorism financing activities.
- 3.4. Any violation of the AML policy must be reported to the AML compliance officer, except in cases where the violation implicates the AML Compliance Officer, in which case an employee must report the violation to the CEO.

4. CHANGES TO THE AML POLICY

4.1. The Company reserves the right to review and amend this AML Policy at its sole discretion. Clients are encouraged to regularly review the Policy. Continued use of the Company's services or website implies automatic acceptance of any introduced Policy changes.