

AML/KYC POLICY

International and local regulations require OÜ Bauhinia.ee, an Estonian company (the “**Exchange**”), as operator of the Bauhinia Exchange online trading platform (the “**Service**”), to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing and other illegal activities, and to take action in case of any suspicious activity by users of the Service (each a “**User**”).

1 IDENTITY VERIFICATION

1.1 Before using the Service, each User must provide the Exchange with the documents and information set forth below according to the stage of verification.

| Individual Users | Corporate / Non-Individual Users |
|---|--|
| 1) E-mail verification 2) Two Factor Authentication (Google Authenticator) 3) Legal Name 4) Date of birth 5) Phone number 6) Address of residence 7) Country of residence 8) Nationality 9) Passport Government-issued photo identification: national identity card, driver’s license 10) Photograph of User holding ID 11) Documentary proof of residence address issued within last 3 months 12) Confirmation letter signed by User to confirm the purpose of trading 13) Other supplemental documents | 1) E-mail verification 2) Two-Factor Authentication (Google Authenticator) 3) Legal Name 4) Date of birth 5) Phone number 6) Address of residence 7) Country of residence 8) Nationality 9) Passport Government-issued photo identification: national identity card, driver’s license 10) Photograph of authorised representative holding ID 11) Documentary proof of residence address issued within last 3 months Above documents for authorised representative 12) Confirmation letter signed by authorised representative to confirm the purpose of trading 13) Documentary proof of existence (business registration certificate, etc.) 14) Documentary proof of authority of the authorised representative 15) Documentary proof of beneficial ownership |

1.2 The Exchange will attempt to verify each User’s identity based on the documents and information provided to the Exchange. The Exchange reserves the right to contact the User for verification purposes, and to conduct further investigation (including requesting additional identity verification documents) of any User.

1.3 The Exchange reserves the right to request updated identity verification information from the User at any time (including in the event that a document has expired).

1.4 Information collected by the Exchange for identity verification purposes will be collected, stored, shared and protected in accordance with the Privacy Policy of the Exchange.

2 TRANSACTION MONITORING

The Exchange reserves the right to monitor Users' transactions for suspicious activity, to share the results of this monitoring with government authorities, and to request further information from Users regarding any suspicious transactions.

3 RIGHTS OF THE EXCHANGE

The Exchange reserves the right to decline a User's transaction(s), freeze a User's account or suspend or terminate a User's service if:

- (a) the User is subject to general or targeted sanctions in any jurisdiction;
- (b) the identity or residence provided by the User appears to be doubtful; or
- (c) the User's transactions on the Exchange appear to be unusual or suspicious.

4 AMENDMENTS

The Exchange may amend this Policy at any time. Amendments to the Policy will be posted on the Exchange's web site.

5 GOVERNING LAW

This Policy will be governed by and construed in accordance with the laws of Hong Kong.

Last Revised: 24 April 2018