

AML Policy

The policy of Gauntlet Holdings LLC – not to enter into business relationships with criminals and/or terrorists, not to process transactions which result from criminal and/or terrorist activity and not to facilitate any transactions involving criminal and/or terrorist activity including the financing of terrorism. The Company undertakes to implement all policies and procedures necessary to prevent the money laundering and to comply with all applicable legislation in this regard.

Introduction

Gauntlet Holdings LLC Anti-Money Laundering Policy (hereinafter - the “AML Policy”) is designated to prevent and mitigate possible risks of Gauntlet Holdings LLC being involved in any kind of illegal activity.

Both international and local regulations require GAUNTLET HOLDINGS LLC to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Users.

AML Policy Covers The Following Matters:

Verification Procedures

Compliance Officer

Monitoring Transactions

Risk Assessment

1. Verification procedures

One of the international standards for preventing illegal activity is **Customer Due Diligence (“CDD”)**. According to CDD, GAUNTLET HOLDINGS LLC establishes its own verification procedures within the standards of anti- money laundering and “**Know Your Customer**” frameworks.

GAUNTLET HOLDINGS LLC ’s identity verification procedure requires the User to provide GAUNTLET HOLDINGS LLC with reliable, independent source documents, data or information (e.g., national ID, international passport, bank statement, or utility bill). For such purposes GAUNTLET HOLDINGS LLC reserves the right to collect User’s identification information for the AML Policy purposes.

GAUNTLET HOLDINGS LLC will take steps to confirm the authenticity of documents and information provided by the Users. All legal methods for double-checking identification information will be used and GAUNTLET HOLDINGS LLC reserves the right to investigate certain Users who have been determined to be risky or suspicious.

GAUNTLET HOLDINGS LLC reserves the right to verify User's identity in an on-going basis, especially when their identification information has been changed or their activity seemed to be suspicious (Unusual for the particular User). In addition, GAUNTLET HOLDINGS LLC reserves the right to request up-to-date documents from the Users, even though they have passed identity verification in the past.

User's identification information will be collected, stored, shared and protected strictly in accordance with the GAUNTLET HOLDINGS LLC 's Privacy Policy and related regulations. Once the User's identity has been verified, GAUNTLET HOLDINGS LLC is able to remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity.

2. Compliance Officer

The Compliance Officer is the person, duly authorized by GAUNTLET HOLDINGS LLC , whose duty is to ensure the effective implementation and enforcement of the AML Policy. It is the Compliance Officer's responsibility to supervise all aspects of GAUNTLET HOLDINGS LLC 's anti-money laundering including but not limited to:

- a. Collecting Users' identification information.
- b. Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations.
- c. Monitoring transactions and investigating any significant deviations from normal activity.
- d. Implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs.
- e. Updating risk assessment regularly.

The Compliance Officer is entitled to interact with law enforcement, who may be involved in prevention of money laundering, terrorist financing and other illegal activity.

3. Monitoring Transactions

The Users are known not only by verifying their identity (who they are) but, more importantly, by analyzing their transactional patterns (what they do). Therefore, GAUNTLET HOLDINGS LLC relies on data analysis as a risk-assessment and suspicion detection tool. GAUNTLET HOLDINGS LLC performs a variety of compliance-related tasks, including capturing data, filtering, record-keeping, investigation management, and reporting. System functionalities include:

- a. Aggregating transfers by multiple data points, placing Users on watch and service denial lists, opening cases for investigation where needed, sending internal communications and filling out statutory reports, if applicable;
- b. Case and document management.

With regard to the AML Policy, GAUNTLET HOLDINGS LLC will monitor all transactions and it reserves the right to:

- c. Ensure that transactions of suspicious nature are reported to the proper law enforcement through the Compliance Officer;
- d. Request the User to provide any additional information and documents in case of suspicious transactions;
- e. Suspend or terminate User's Account when GAUNTLET HOLDINGS LLC has reasonable suspicion that such User engaged in illegal activity.

The above list is not exhaustive and the Compliance Officer will monitor Users' transactions on a day-to-day basis in order to define whether such transactions are to be reported and treated as suspicious or are to be treated as bona fide.

4. Risk Assessment

GAUNTLET HOLDINGS LLC , in line with the international requirements, has adopted a risk-based approach to combating money laundering and terrorist financing. By adopting a risk-based approach, GAUNTLET HOLDINGS LLC is able to ensure that measures to prevent or mitigate money laundering and terrorist financing are commensurate to the identified risks. This will allow resources to be allocated in the most efficient ways. The principle is that resources should be directed in accordance with priorities so that the greatest risks receive the highest attention.

For more information, reach out to us through the Contact Us form in the website.