



# DotV OÜ - Anti Money Laundry Policy

## Introduction

The purpose of this policy is to ensure DotV's compliance with anti-money laundering laws and regulations, to assist law enforcement in combating illegal money laundering and to minimize the risk of any resources of DotV being used for improper purposes.

It is the policy of DotV to prohibit and prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by complying with all applicable requirements under the EU Anti Money Laundering Directives and its implementing regulations.

**Money laundering** involves the placing of illegally obtained funds into legitimate financial systems so that proceeds derived from illegal activity can be transformed into funds with an apparently legal source. Typically, money laundering follows a three-stage process:

- **Placement** – Physically disposing of monetary proceeds derived from illegal activity.
- **Layering** – Separating the proceeds of criminal activity from their illegal source through layers of financial transactions.
- **Integration** – Placing laundered funds back into the economy, attempting to have the funds re-enter the financial system legitimately.

Often there is a complex trail involved so that the practice cannot be easily identified or traced. Money laundering can occur in many ways. It may happen by dispersing money through many different bank accounts (to hide its origins) but can also occur when an organization is used unwittingly as a "trading partner." This could be directed at DotV or sometimes through subsidiaries of DotV or other entities associated with DotV.

**Terrorist financing**, on the other hand, is the use of funds (legitimately or unlawfully generated) being used for improper purposes such as enabling certain types of criminal activities and supporting terrorist groups.

The operations of DotV are limited to EU jurisdiction. As by the sixth anti money laundering directive (6AMLD) which includes a harmonization across all EU countries we have a solid framework to rely on and comply with. As the operations might expand in the future the DotV AML Program will be updated accordingly.

## AML Program

The Company Director (or self-proclaimed Supervisor of Systems Evolution) has been designated to be the Compliance Officer (the “AML Compliance Officer”) to administer this anti-money laundering policy (the “AML Program”) and ensure that all policies, procedures and internal controls of the AML Program are followed.

The AML Compliance Officer of DotV will serve as the primary contact with respect to anti-money laundering compliance, implementation and oversight. The functions of the AML Compliance Officer include, without limitation:

- (a) monitoring the compliance of DotV with anti-money laundering rules and regulations;
- (b) resolve issues of heightened due diligence and certain “red flag” issues;
- (c) periodically reviewing the AML Program to ensure its effectiveness and to revise the AML Program to reflect any changes in anti-money laundering rules and regulations;
- and (d) conducting appropriate oversight relating to the requirements of the AML Program.

In addition, the AML Compliance Officer will ensure that all records concerning the AML Program are properly maintained. In fulfilling their responsibilities under this AML Program, the AML Compliance Officer of DotV may consult with or retain outside legal counsel or other knowledgeable anti money laundering experts.

## Internal Controls

DotV carries out the following procedures that help it identify donors before accepting or entering into a relationship or transaction with them. DotV applies a risk-based approach to its due diligence of donors. Except as described below, DotV will ensure that it has a reasonable belief that it knows the true identity of its donors to verify and document the accuracy of the information we receive about them.

With respect to **online donations** or donations received through websites, whether sponsored by DotV or a third party, DotV operates such donation channel through processors, which have their own anti-fraud and vetting procedures, or generally relies on the due diligence process of the financial institutions through which those donations are received (SEPA).

With respect to **other donors**, the Company Director will analyze the information that it receives to determine whether the information is sufficient so that DotV is able to form a

reasonable belief that it knows the identity of its donors and that the nature of the donors' activities is non-criminal. **Anonymous donations are not accepted.**

With respect to **contractors**, the Company Director will similarly analyze the information that it receives to determine whether the information is sufficient so that DotV is able to form a reasonable belief that it knows their identity and that their activities is of non-criminal nature.

DotV will verify the information within a reasonable time before the transactions in question.

Depending on the nature of the transactions, we may refuse to complete a transaction before we have verified the information, or in some instances when more time is required, we may, pending verification, restrict the types of transactions we will conduct with a third party.

If we find suspicious information that indicates possible money laundering, terrorist financing activity or other suspicious activities, we will, after consultation of an outside counsel, make any reports or filings that may be required in accordance with applicable laws and regulations.

If we cannot form a reasonable belief that we know the true identity of a donor or contractor or we have questions regarding the source of their income or assets, we **will not engage in any business transaction with them.**

If following receipt of a donation or after a transaction with a third party, we subsequently learn of information that indicates that the donation or the transaction may have involved some form of money laundering, we will, to the extent possible and practicable, return the donation to the donor or cease all forms of transactions with the third party, as the case may be.

## Policy on Disclosure

If anyone knows, suspects or has reasonable grounds for thinking or suspecting that a person is engaged in money laundering or terrorist financing, they must report such matters to the AML Compliance Officer immediately.

Disclosure should include details on:

- The people involved The type of transaction
- The relevant dates
- Why there is suspicion
- When and how activity is undertaken
- Likely amounts

The AML Compliance Officer will complete his or her review of any report within 60 days after receipt thereof. The AML Compliance Officer will consider the report and any other

available information, and consult with an outside counsel, if necessary. Once the AML Compliance Officer has evaluated the disclosure or other information, the AML Compliance Officer will determine if:

- There are reasonable grounds for suspecting money laundering and the appropriate steps to be taken
- Whether the matter is required to be reported to the applicable governmental agency or other enforcement authorities

All disclosure reports referred to the AML Compliance Officer and reports made by DotV to the applicable governmental agency or other enforcement authorities will be retained for a minimum of five years.

No one associated with DotV, whether as a board member, officer, employee, consultant, intern or volunteer, may under any circumstances, disclose to prospective donors or suppliers or their representatives that DotV is taking any action (e.g., declining to accept a donation or terminating a transaction) based on suspected money laundering without the prior approval of the Company Director. Anyone who makes such a disclosure without prior approval may be subjecting himself or herself, as well as DotV, to criminal “obstruction of justice” claims because the disclosure may notify a money launderer that his or her illegal scheme has been detected, thereby enabling the suspect to take action to prevent prosecution by law enforcement agencies.

## Final Notice

Failure to adhere to this AML Program may, to the extent permitted under applicable law, subject the individual to disciplinary or other appropriate action up to and including termination of contracts. Violations of money laundering laws also may subject DotV’s management to imprisonment and, together with DotV, to fines, forfeiture of assets and other serious punishments.