

## **EBC Anti-Fraud Policy**

### **1. Introduction**

The Anti-Fraud Policy (the “**AF Policy**”) of **EBC Mauritius Limited**, a company incorporated in the Mauritius with a registered number 117884 C1/GBL and registered office at C/o Sanlam Trustees Int Ltd, Labourdonnais Village, Mapou (**EBC**) and Choise Services UAB (“**Company**”, “**Choise**”, “we” or “us”) is established to prevent and mitigate possible risks of Choise Services UAB being involved in illegal or illicit activities and to enable Choise Services UAB to meet its legal and regulatory obligations in this area (if any, where applicable). This AF Policy is subject to changes and updates by Choise from time to time to ensure compliance with any applicable legislation and global AF practices.

Therefore, Choise Services UAB is regulated and compliant with the laws and regulations to combat money laundering and terrorist financing:

- Law on the Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania
- Order of FCIS Director No. V-240 on approval of “Money laundering and suspicious monetary operations or transactions recognition criteria list”
- Order of FCIS Director No. V-129 on the approval of “Recommendations for the information submission forms, submission scheme, and filling of submission forms according to the requirements of the Law on the prevention of money laundering and terrorist financing”
- Order of FCIS Director No. V-5 issued 2020-01-10 on the approval of “Instructions for deposit network operators to prevent money laundering and/or terrorist financing “
- Order of FCIS Director No. V-129 on the approval of “Recommendations for the information submission forms, submission scheme, and filling of submission forms according to the requirements of the Law on the prevention of money laundering and terrorist financing”
- Recommendations for Money Laundering of FATF

### **2. Policy Statement**

2.1. Choise will comply with the applicable laws of Lithuania. In line with applicable laws, Choise has a ‘zero tolerance’ policy towards fraud, collusion, money laundering, financing of terrorism, and other criminal conduct and will thoroughly investigate and seek to take legal action against those who perpetrate, are involved in, or assist with fraudulent or other improper actions in all Choise activity and related transactions.

2.2. Choise will provide adequate and appropriate resources to implement the Anti-Fraud Policy and will ensure it is communicated and understood.

### **3. Purpose&Scope**

3.1. The purpose of this document is to outline the responsibilities of all the involved parties concerning fraud prevention, the actions to be taken if fraud is suspected the mechanism of verifying suspicion of fraud, the reporting process, and the recovery action plan.

### **4. Legislation Compliance**

- 4.1. The Anti-Fraud Policy has been drafted to comply with the currently applicable law, including, but not limited to applicable laws of Lithuania.
- 4.2. Adherence to the Anti-Fraud Policy Choise will ensure compliance with all relevant legislation and internal policies.

## **5. The User verification**

- 5.1. The User undertakes to provide Choise with correct and relevant personal information and documents contained therein. In case the User provides counterfeit documents and false personal information, such behavior will be interpreted as fraudulent activity.
- 5.2. The User hereby authorizes Choise, directly or indirectly (through third parties, including Crypterium AS), to make any inquiries as we consider necessary to check the relevance and accuracy of the information provided for verification purposes. Personal Data transferred will be limited to strictly the necessary and with security measures in use to protect the data as specified in our Privacy Policy.

## **6. Account Security**

- 6.1. The User is responsible for maintaining the confidentiality of their Account's credentials, including, but not limited to a password, email, wallet address, balance and of all activity including transactions made through the Account.
- 6.2. If the User has any security concerns about his/her Account, login details, password or other security feature being lost, stolen, misappropriated, used without authorization or otherwise compromised, the User is advised to change the password. The User must contact us via [appsupport@ebcmu.com](mailto:appsupport@ebcmu.com) without undue delay on becoming aware of any loss, theft, misappropriation or unauthorized use of the Account, login details, password or other security features. Any undue delay in notifying Choise may not only affect the security of the Account but may result in the User being liable for any losses as a result.
- 6.3. Any loss or compromise of the User's electronic device or the User's security details may result in unauthorized access to the User's Account by third parties and the loss or theft of any digital currency held in the User's Account. The User must always keep his/her security details safe. For example, User should not write them down or otherwise make them visible to others.
- 6.4. The User should never allow remote access or share his/her computer screen with someone else when the User is logged on to the Account. Choise will never under any circumstances ask the User for IDs, passwords, or 2-factor authentication codes, screen share or otherwise seek to access the computer or Account. User should not provide details to any third party for the purposes of remotely accessing User's Account unless specifically authorized.
- 6.5. Choise assume no responsibility for any loss that the User may sustain due to the compromise of Account login credentials due to no fault of Choise.

## **7. Key Responsibilities**

- 7.1. In view of the Anti-Fraud Policy Choise is responsible for:
  - Undertaking a regular review of the fraud risks associated with each of the key organizational objectives;

- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified;
- The design of an effective control environment to prevent fraud;
- Establishing appropriate mechanisms for:
  - reporting fraud risk issues.
- Making sure that all staff are aware of Choise Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud; and
- Ensuring that appropriate action is taken to minimize the risk of previous frauds occurring in the future.

## **8. Fraud detection and investigation**

- 8.1. Choise 's Operational Anti-Fraud Department, in particular, the Head of Anti-Fraud Services, is the first line of detection, investigation, and protection in preventing Prohibited Activities through the Users and transactions appraisal process. The Head of Anti-Fraud Services will be responsible for the proper fulfillment of the Anti-Fraud Policy.

## **9. Miscellaneous**

- 9.1. Choise will review the Anti-Fraud Policy to reflect new legal and regulatory developments and ensure good practice.