ANTI-MONEY LAUNDERING POLICY

1537292 B.C. LTD. ("we" or "our") has developed an Anti-Money Laundering and Counter-Terrorism Financing Policy ("AML/CTF Program") for our digital virtual currencies exchange, available at https://allswappro.io, in an effort to maintain the highest possible compliance with applicable laws and regulations related to anti-money laundering in Canada, as well as in other jurisdictions where we operate. This includes, but is not limited to:

Establishing robust internal policies, procedures, and controls designed to prevent any attempted use of 1537292 B.C. LTD. for illegal or illicit purposes, while ensuring consumer protection under applicable laws.

Maintaining comprehensive records of transactions and other financial activities.

Implementing Know Your Customer ("KYC") procedures for all customers.

Conducting regular, independent audits of our AML/CTF Program.

Adhering to record retention requirements.

Providing ongoing compliance training for all employees.

POLICIES AND PROCEDURES

Our AML/CTF Program has been reviewed and approved by our Board of Directors (the "Board"). This program is regularly updated to comply with applicable laws, regulations, and policies.

INTERNAL CONTROLS

We have developed robust internal policies, procedures, and controls to comply with AML/CTF laws and other regulatory requirements. These controls are designed to detect and prevent financial crimes, ensuring the security and integrity of our platform.

TRAINING

All employees and officers receive broad-based AML/CTF training, as well as role-specific training. Employees must complete this training at least once every twelve (12) months to ensure they remain knowledgeable about compliance obligations. New employees undergo training within thirty (30) days of their start date. Documentation related to training, including attendance records, materials, and assessments, is maintained for compliance purposes.

COMPLIANCE

Our compliance team is responsible for developing and enforcing the policies and procedures of our AML/CTF Program. This team monitors all transactions and ensures compliance with applicable financial regulations.

CUSTOMER IDENTIFICATION (KYC)

The KYC process is a critical part of our AML/CTF Program, designed to prevent fraud and detect suspicious activity.

ACCOUNT OPENING PROCESS

To open an account and use 1537292 B.C. LTD.'s services, customer identities must be verified, authenticated, and checked against applicable government watchlists. Failure to complete this process will result in the inability to use our platform.

Individual Customers

Prior to account approval, we collect, verify, and authenticate the following information:

Email address

Mobile phone number

Full legal name

Government-issued tax ID number

Date of birth (DOB)

Occupation

Proof of identity (e.g., passport, driver’s license)

Residential address (not a P.O. Box)

Additional supporting documents as required, such as utility bills or bank statements

If a customer successfully meets our KYC requirements and does not appear on any applicable government watchlist, we will electronically provide account opening agreements.

Corporate Customers

Prior to account approval for corporate customers, we collect, verify, and authenticate the following information:

Company’s legal name

Registered company number

Full legal names of all account signatories and beneficial owners

Email addresses and phone numbers of all account signatories

Principal business address and/or other physical location

Proof of legal existence (e.g., government-issued business license, articles of incorporation, or trust documents)

Contact details of owners, executives, and principal managers

Proof of identity (e.g., passport or government-issued ID) for each beneficial owner holding 25% or more of the company

Identifying details of any entity beneficial owners (applying the same requirements as for individuals)

Once a corporate entity successfully meets our Know Your Business (KYB) requirements and none of its owners, executives, or managers appear on any applicable government watchlists, we will electronically provide account opening agreements.

SUSPICIOUS ACTIVITY & REPORTING

We may freeze or suspend any account and report to relevant authorities if we know, suspect, or have reason to believe that suspicious activities have occurred. A suspicious transaction may be identified if it is inconsistent with a customer’s known business activities, personal financial status, or transaction history.

Our compliance team actively monitors transactions for unusual patterns, conducting thorough investigations into any flagged activities. If necessary, reports will be submitted to relevant regulatory authorities.

RECORD-KEEPING REQUIREMENTS

All records related to AML compliance are retained for five (5) years and are readily available upon request by regulatory authorities, law enforcement agencies, or examiners.

For any questions regarding our AML/CTF Program, please contact us at support@allswappro.io.