

Know Your Customer Policy

KYC - KNOW YOUR CLIENT

1. INTRODUCTION

The 4TBank Policy, to get to know its Customers (KYC) aims to promote the guidelines and detail our concepts for the practices of monitoring customers and their operations, being a fundamental part in the contribution of preventing money laundering and combating the financing of terrorism.

It is the responsibility of all employees, partners and directors of 4TBank, the knowledge, understanding and interest in the guidelines of this document.

2. INTERNAL STANDARDS

- 4TBank's PLD-CFT Policy - Preventing Money Laundering and Combating the Financing of Terrorism.

3. GUIDELINES

The guidelines used to Know Your Client (KYC) at 4TBank are listed below in order to highlight the applied practices and provide transparency in the relationship with its clients and partners, as well as governments and regulatory authorities.

3.1 Making the Register

As 4TBank is a company that operates only through its digital platform, the client's registration is carried out in a systemic way through the registration of data on the platform and upload of documents by the client candidate itself. The requested registration documentation must be approved by the 4TBank Registration System to start the relationship. And, periodically, the registration information and documentation must be updated by the customer himself to allow the continuation of the relationship, whenever changes occur.

The initial registration procedure consists of obtaining the following information:

I. If Individual:

- a) full name;
- b) CPF number;
- c) gender;
- d) date of birth;
- e) telephone number;
- f) e-mail address;
- g) complete home address;
- h) number of the photo identification document; i) copy of the photo identification document;
- j) sylph holding the photo identification document; and k) bank details in the country.

II. If Legal Entity:

- a) corporate name
- b) fancy name;
- c) CNPJ number;
- d) business telephone number;
- e) complete business address;
- f) copy of the articles of association;
- g) copy of the CNPJ card;
- h) bank details in the country
- i) full name of the authorized representative;
- j) CPF number;
- k) gender;
- l) date of birth;
- m) telephone number;
- n) e-mail address;
- o) number of the photo identification document;
- p) copy of the photo identification document.

III. According to the operational profile, the following additional information and documents may be requested:

- a) proof of address;
- b) occupation;
- c) declaration of income bracket;
- d) proof of financial capacity;
- e) among others.

3.2 How Customers are identified

The identification process applies naturally at the beginning of the relationship with the customer. Identification is the act of confirming who a person claims to be by providing information and examining the documents provided. Documentary evidence must be satisfactory and reliable in identifying the customer.

In the case of a legal entity, it is essential to know who owns the company and what the corporate composition is in order to identify the final beneficiary, that is, the one who exercises control or significant influence in management.

3.3 Check of blacklists and WBS list

The restrictive lists must be checked at the customer's entrance and periodically against the database. If it is found that the customer is on an impeding list, the "Compliance" area must be communicated to assess the beginning or maintenance of the relationship.

Communication to the "Compliance" area is mandatory, establishing a business relationship with a client characterized as a politically exposed person - PEP.

3.4 Consultation with Government Agencies

It is mandatory to consult the regularity of the CPF for individuals and CNPJ for legal entities with the Secretariat of the Federal Revenue of Brazil in order to verify its regularity.

3.5 Financial Capacity and Economic Rationale

It is necessary to evaluate, by requesting a personal statement or additional supporting documentation, the compatibility between the client's activity vis-à-vis its assets and its financial capacity, as well as its knowledge and experience with Virtual Currency, in the case of operations above the established limits internally, also taking into account the volume of transactions, the periodicity and the form of payment.

3.6 Customer Visit

Commercial visits to the customer may be carried out, if applicable, in order to understand the purpose of the company's relationship with 4TBank and the compatibility with its economic and financial capacity, as well as its experience and knowledge of the Virtual Currency market.

3.7 Customer Profile and Purpose of the Business Relationship

At the beginning of the relationship and even later, it is possible to identify the purpose of the business relationship with the customer, by evaluating its operations.

The evaluation of the profile of 4TBank's customers takes into account, mainly, the following behaviors in the business relationship:

- Customers operating up to the limit of R \$ 10,000.00 (ten thousand reais);
 - Customers operating between the limits of R \$ 10,000.00 (ten thousand reais) to R \$ 100,000.00 (one hundred thousand reais);
 - Customers operating over R \$ 100,000.00 (one hundred thousand reais); - Customers who carry out up to 5 operations per month;
 - Customers who carry out more than 5 operations per month;
 - Customers who operate a single cryptocurrency;
 - Customers who operate more than one cryptocurrency;
 - Customers who deposit balance in cryptocurrencies on the platform.
- 4TBank will monitor the operations of each client according to the type of relationship and profile presented.

4. FINAL CONSIDERATIONS

Any doubts regarding the clauses of this document can be resolved by the “Compliance” area.

Non-compliance with the clauses contained in this policy is subject to analysis by the Executive Board, under the effect of the application of disciplinary measures.