

Anti-money laundering, Know your client and Know your transaction policies (AML&KYC&KYT)

In order to protect the funds of our clients and ensure the compliance with international trade standards, By Trend LLC (hereinafter - the Company) operates exclusively in accordance with the law on combating money (including fiat money and various crypto-assets) laundering, gained by criminal means, and countering the financing of terrorism and criminal activities.

To monitor the accordance with legal requirements, the Company established Compliance department developing Anti-money laundering, Know your client and Know your transaction (AML/KYC/KYT) procedures, obligatory for all employees of the Company and determining the policy of engagement with those registered on the Company's website www.bytrend.com (hereinafter - the Site) and opened an account (hereinafter - the Clients).

Compliance Department is intended to ensure that all the operations of the Company are consistent with the international standards to combat money laundering and all the documents provided by the client are up-to-date and comply with relevant legal requirements. Due to these facts by opening an account on the Site a Client performs complete and unconditional acceptance of the policy conditions, agrees with the following rules and undertakes to observe them:

1. The company is developing a list of documents, the provision of which is necessary for a Client for the purpose of identity verification, namely: color passport copy (first and second pages with photos, as well as a page with the data of registration) or a color copy of a document, which is proper for Client's identity verification under the law of

the country of residence. Upon the request of the Company additional documents can be provided: a copy of a driver's license, a receipt for payment of utility bills (to confirm the place of residence of the Client). Also, the verification process involves mandatory confirmation of Client's phone number;

2. The withdrawal from the Client's account is allowed only after the verification of a Client on the basis of provided proper documentation and completed questionnaire. The withdrawal is carried out only to the account belonging to a person identified as a client of the company (the owner of a personal account on the site). The withdrawal of funds to third parties is prohibited. Internal transfers between the Company's clients are also forbidden;

3. The Company is obliged and has the right without obtaining prior consent to share with financial institutions and law enforcement agencies any information about a Client, as required by applicable law, and a Client gives the Company his consent to these actions. In order to comply with this paragraph, the Company holds any information about payment transactions of a Client during five years at least;

4. A client undertakes to respect the legal norms, including international ones, aiming to combat illicit trafficking, financial fraud, money laundering and legalization of funds obtained by illegal means;

5. A Client undertakes to make maximal effort to avoid direct or indirect complicity in illegal financial activities and any other illegal transactions using the company's website;

6. A Client guarantees the legal origin, legal ownership and the right to use the funds transferred to the account;

7. In case of the evidence of suspicious transactions at the Client's account, cash replenishments from untrusted sources (for example, the data of assets' sender and

trading account's owner are not the same) and/or any actions with signs of fraud (including any refunds or cancellation of payments), the Company reserves the the right to conduct an internal investigation, to block or close a Client's account, cancel any payment and to suspend operations on the account before the end of the official investigation. When making the decision the Company is guided by the provisions of the applicable law or by common practice;

8. The Company has the right to request additional information about a Client if the withdrawal method is different from the input method. The Company also reserves the right to block a Client's account during the investigation, if a Client refused to provide the additional information requested by the Company;

9. In the course of investigation the Company has the right to request additional copies of the documents confirming the identity of a Client, as well as copies of bank cards used to replenish the account, payment and other documents confirming the lawful possession and legal origin of funds. In the case of providing the copies of the documents, the Company has the right to demand the provision of original documents for review;

10. The company will especially scrutinize clients, defined by the applicable law as located in high-risk countries;

11. The refuse of the Company to perform the operations that are considered from the point of view of the Company as suspicious (including blocking or closing of a Client's account) is not the reason for civil liability of the Company for failure to fulfill obligations to a Client;

12. If the Client requests the investor's password to his/her own trading account from The Company, the Company has every reason to believe that the Client intends to transfer the data (login and password of the trader) from his/her trading account to a

Third party for the purpose of trading on the Client's account. In this case, the Company has the right to apply to a Third party all the requirements imposed on the company's Clients, including, but not limited to the verification of personal data using all available methods of communication with the Company's Client and a Third party to whom the Client has transferred control of his trading account. Including verification of the Third party according to its policy, AML/KYC/KYT and/or other internal Company policies. Refusal to carry out the verification procedure within the framework of AML/KYC/KYT policies and/or other policies will be interpreted by the Company as a waiver of compliance with the provisions of the Client agreement and all internal policies of the Company, which are an integral part of it. In this case, the Company reserves the right to act in accordance with the company's internal policies governing the relationship between the Client and the Company;

13. The Company is not obliged to inform clients and other persons about the measures taken to counter the legalization (laundering) of proceeds from crime and terrorist financing, with the exception of informing the clients about the suspension of an operation, about the refuse of execution of a Client's order on carrying out operations, about the refuse to open a account, about the need of providing Client's documents;

14. Know your transaction policy (KYT) is a part of AML/KYC/KYT policies and is aimed at identifying any client's transactions in the event of a precedent, when the Company has reasonable suspicions that the Client uses the Company's service for other purposes;

15. Such a precedent may arise if the Company suspects the Client in actions that may be qualified as laundering or attempted laundering of various digital assets (including crypto-currencies and other crypto-assets) obtained, including illegal or openly criminal means. In this case, the Company reserves the full right:

15.1. Require the Client to provide additional information disclosing the origin of digital

- assets and / or confirming that these assets have not been obtained by criminal means;
- 15.2. Block the client's account, transfer the necessary information to the law enforcement authorities at the place of registration of the Company and at the place of registration of the Client, if necessary;
- 15.3. Require the Client to provide additional documents confirming The client's identity, physical existence and solvency;
- 15.4. To carry out the withdrawal of digital assets only on the details from which the transfer took place or to withdraw to other details, after a full check by the security service of the Company;
- 15.5. To refuse the Client in the conclusion to the account of third parties;
- 15.6. Request, confirming that the input source of the digital assets of the Client in the form of the Company (the procedure of verification of the payer);
- 15.7. The company reserves the right to monitor the entire chain of transactions in order to identify suspicious transactions or transactions for which it is difficult or impossible to track the entire chain of movement of digital assets from the moment of their appearance. In this case, the Company reserves the right to refuse to provide the service to the Client if the Company has reasonable suspicions about the legality of the origin of these digital assets. The company has the right to act in accordance with paragraphs 15.1, 15.2, 15.3 of this policy;
16. This anti-money laundering policy is an integral part of the client agreement, on the basis of which a Client opens an account in the personal space on the Site (bytrend.com/client).



By Trend LLC

By Trend LLC a Business Company, duly incorporated under the laws of St. Vincent and the Grenadines with its registered office at Suite 305, Griffith Corporate Centre, Kingstown, St. Vincent & the Grenadines.
Limited Liability Company Number 361 LLC 2020, registered at 6th of May, 2020.

Website: www.bytrend.com; e-mail: support@bytrend.com.