



## Customer AML/CTF POLICY

### Intent

This is a public policy document outlining our KYC management for onboarding customers and to manage the ongoing AML/CTF monitoring process for compliance with AUSTRAC registration requirements. This policy, in part, references our AML/CTF program (customer due diligence procedures)

### Scope

This policy applies to all customers of Metex Corp Pty Ltd (Metex) controlled exchanges and affiliate programs prior to transfer of funds or trading on any Metex controlled exchange.

### Policy

#### 1. Investors

- 1.1. Any investor applying for shares in Metex Corp Pty Ltd will undergo KYC ID verification and AML/CTF/PEP clearance as part of the due diligence process
- 1.2. Entity investors will have the entity verified
- 1.3. Beneficial owners of investing entities will have individual ID verified.
- 1.4. Entity and beneficial owners will be subject to ongoing enhanced customer due diligence and AML/CTF/PEP monitoring

#### 2. Customers applying for access to Metex exchanges or affiliate programs

- 2.1. Any customer applying for an account on any Metex controlled exchange is subject to this policy.
- 2.2. The KYC ID verification process must be completed before any funds can be transferred into, or out of any trading accounts (digital wallets)

#### 3. KYC ID Verification - Australia

- 3.1. Metex will maintain contracted services with VIX Verify Pty Ltd to act as our DVS Gateway Service Provider (GSP).
- 3.2. The KYC process for all customers domiciled in Australia will be conducted through the Metex website integrated with the API provided by VIX Verify.
- 3.3. VIX Verify will maintain compliance evidence for AUSTRAC audit purposes.
- 3.4. A unique ID verification code will be provided by VIX Verify and held on record for each verified Australian resident customer

## 4. KYC ID Verification - Countries other than Australia

- 4.1. Metex will maintain contracted services with GB Group Plc. to act as our international ID verification service provider.
- 4.2. The KYC process for all customers domiciled outside Australia will be conducted through the Metex website integrated with the API provided by GB Group Plc.
- 4.3. GB Group Plc. will maintain compliance evidence for AUSTRAC audit purposes.
- 4.4. A unique ID verification code will be provided by GB Group Plc. and held on record for each verified customer.

## 5. KYC ID Verification - Entities

- 5.1. Metex will verify company details including registration and beneficial owners.
- 5.2. All beneficial owners will undergo individual KYC ID verification.
- 5.3. Metex relies on an electronic-based safe harbour procedure where:
  - a beneficial owner's full name; and
  - their full residential address or their date of birth, or both
  - have been verified from reliable and independent electronic data from at least two separate data sources. Reporting entities may verify an individual's identity electronically by using records held by a credit reporting agency.

## 6. Legal basis for collection of personal data, ID verification and ongoing monitoring

- 6.1. Metex is required collect and process sufficient documentation and personal information to enable KYC ID verification under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act)
- 6.2. Metex is required to conduct ongoing monitoring of its customers and transaction activity
- 6.3. The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) is part of a legislative package which brings Australia into line with international best practice to deter money laundering and terrorism financing.
- 6.4. The AML/CTF Act covers the financial sector, gambling sector, bullion dealers and other professionals or businesses that provide services covered by the Act.
- 6.5. Digital Currency Exchanges are covered by the Act.
- 6.6. Metex Corp Pty Ltd is registered with AUSTRAC as operating a Digital Currency Exchange

## 7. Metex Transaction Compliance Overview

- 7.1. The complex regulatory compliance requirements for onboarding members transacting on our exchange and ongoing customer due diligence along with transaction monitoring and reporting, is simple in approach, but complex in detail.





## **8. Green ID (VixVerify) and GB Group - Onboarding ID Verification**

- 8.1. Metex chose reliable and well recognised partners as part of our commitment to best practice in legislative and corporate compliance. Managing transaction monitoring and reporting risks associated with our scope of operations is a complex task. Partnering with like minded service providers enables us to leverage their experience and technical expertise in applying our policies and procedures to manage these risks.
- 8.2. Green ID (VixVerify) and GB Group are our preferred providers of services in onboarding members for the purpose of AUSTRAC compliance in the requirements for Know Your Customer/Anti Money Laundering/Counter Terrorism Financing (KYC/AML/CTF) initial screening and ID verification.
- 8.3. Enhanced services extend to other financial crimes and criminal activity involving funds transfers. Corporation intelligence and screening services for onboarding organisations within our scope of operations is also included in the range of services offered by our providers.

## **9. Ongoing and Enhanced Customer Monitoring**

- 9.1. The cryptocurrency industries are heavily regulated under Anti-Money Laundering laws. As Metex is by nature a global business, it needs a robust and scalable screening solution to avoid compliance risk, as sanctions and PEPs screening is a crucial and mandatory part of the AML requirement.

## **10. Public AML and CTF Policy Notice**

- 10.1. Metex will publish on its exchange websites a policy outlining our approach to the AUSTRAC requirements for customers as detailed below.

## **11. Public AML and CTF POLICY**

- 11.1. As the operator of cryptocurrency and digital asset exchanges operating in Australia, METEX Corp Pty Ltd is bound by Australian Law to be registered with the Australian Transactions Reports and Analysis Centre (AUSTRAC).
- 11.2. In keeping with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) and the Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (AML/CTF Rules), METEX is required to implement staff training, know your customer checking processes, and reporting systems to help identify, manage and mitigate risks associated with our services being used to either launder money, and/or finance illegal activities including drug trafficking or terrorism.

## **12. Our Measures**

- 12.1. The following is a list of some of these measures:
  - All clients that are provided with a designated service will undergo an ID verification check to confirm identity prior to being provided that designated service.
  - All clients that are provided with a designated service, having successfully undergone an ID verification check will be allocated a unique ID to enable them to use a designated service.
  - All clients that are provided with a designated service will be maintained on a database for ongoing customer due diligence screening as required by AUSTRAC.

- Clients that are provided with a designated service may be directly called by one of our compliance team support staff to confirm application and identify over the phone.
- Fiat currency deposits by direct debit can only be accepted from a bank account held in the same name and verified address as the as the trading account being loaded.
- Fiat currency withdrawals can only be made to a bank account held showing the same name and address as the account holder.
- Any withdrawals will require the proof of a bank account held in the same name and verified address as the registered trading account before being approved for transfer.
- Educating our employees so they can understand risks, identify, monitor and report any suspicious matters.
- Ensuring our employees are aware that suspicious matters are not limited to financial transactions.
- Reporting when appropriate any suspicious activity across the Metex operated exchanges to AUSTRAC.
- Reporting physical cash transactions over AUD\$10,000 or more or multiples under this value that may seem suspicious.
- Reporting cross border (IFTI) transactions as required.
- Carrying out ongoing customer due diligence checks.
- Monitoring the transactions conducted by our customers.

### **13. Our Purpose**

13.1. The key outcomes we are looking to achieve with of our AML/CTF program include:

- Only dealing with customers we can properly identify.
- Managing customers we are unable to properly identify.
- Protecting our products and services from being utilised by money launderers, terrorist financiers, or anyone else that may choose to support these types of individuals.
- Combating, detecting and reporting any use of our services for laundering of funds and for the possible purpose of financing terrorism related activities.
- To help provide guidance and direction to ensure compliance with appropriate regulatory requirements including the AML/CTF Act and AML/CTF Rules.
- Helping to support the protection of the reputation of METEX as the operator of the exchanges.
- Helping to create a good reputation standard for other exchanges operating in the crypto currency sector.
- To prevent payment of any ransomware, including, but not limited to crypto-locker.

### **14. Our AML/CTF Program**

14.1. The METEX AML/CTF program was tailored by our partners and our legal firm in support of our business risk profile of running exchange service offerings. It has taken into regard the specific systems and controls being implemented by METEX for the exchanges, including (without limitation):

- How METEX manages employee due diligence by screening all prospective and existing employees, including contractors and temporary employees.
- How METEX has designed its AML/CTF training program to ensure all employees receive relevant and ongoing training in identifying and reporting any suspicious activity.
- How METEX ensures our employees understand the importance of meeting our regulatory obligations under the AML/CTF Act.
- How we support governance by the designation of an AML/CTF compliance officer responsible for overseeing the AML/CTF program.
- Procedures that may need to address customer due diligence requirements, client record keeping and reporting requirements, as well as any of the processes being used by METEX for the identification, reporting and escalation of suspicious transactions.
- Independent audit which includes a periodic evaluation of the AML/CTF program by another third party and validates and tests the effectiveness of AML/CTF processes and procedures being used.
- Strict adherence to the AML/CTF Act and AML/CTF Rules and guidelines as issued by AUSTRAC and any regulators from time to time.

## 15. Our Responsibilities

- 15.1. The METEX Corp Pty Ltd board of Directors and senior management have ongoing oversight of the METEX AML/CTF policy and procedures.
- 15.2. As part of the METEX staff onboarding process employees are familiarised with the company AML/CTF policies, being required to attend a training session specific to their role and are briefed in the procedure for identifying and reporting any suspicious matters or behaviours.
- 15.3. METEX have a full-time dedicated AML/CTF compliance officer that is responsible for the regular monitoring the status and effectiveness of the employed AML/CTF risk management and compliance framework.

Further Information can be found at:

- The Attorney-General's Department: <https://www.ag.gov.au/>
- AUSTRAC: <http://www.austrac.gov.au/>
- Australian Crime Commission: <https://www.acic.gov.au/>

## Related policy instruments

- Metex AML/CTF program
- Customer AML/CTF Procedures
- Cookies Acceptance Policy
- Terms and Conditions
- Privacy and GDPR Policy

## Administration

NOTE: Printed copies of this policy are uncontrolled, and currency can only be assured at the time of printing. Approval Details:

Policy Sponsor	Compliance Officer
Approval Authority	CEO
Date for next Major Review (in accordance with the Policy Handbook)	01/06/2023

### Revision History

Version	Approval date	Implementation date	Details	Author
DRAFT v1	09/11/2018	19/11/2018	Policy established	Brett Wilkins-Byrd Compliance Officer
DRAFT v2	05/01/2019	05/01/2019	Policy draft updated for review	Brett Wilkins-Byrd Compliance Officer
V 1.1	16/03/2019	14/01/2019	Title Updated	Brett Wilkins-Byrd Compliance Officer
V 2	28/03/2019	28/01/2019	Review and minor update	Brett Wilkins-Byrd Compliance Officer
V 3	01/06/2020	01/06/2020	Review and minor update	Brett Wilkins-Byrd Compliance Officer

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