

## **ScapesMania KYT/AML Policy**

Last Updated: January 15, 2024

### **Policy Purpose:**

The ScapesMania KYT/AML Policy is designed to identify the clients involved in transactions, especially in cases where there are reasonable suspicions that the client is misusing the ScapesMania platform or engaging in illicit activities.

### **Situations Triggering KYT Measures:**

The policy will be enforced when there are suspicions of illegal activities potentially qualifying as money laundering or attempts to launder digital assets acquired illegitimately or originating from overtly criminal sources. To this end, ScapesMania will utilize legal information, third-party digital asset origin analysis tools, and our proprietary transaction screening systems.

### **ScapesMania Rights and Measures:**

Request Additional Information: Require clients to provide further details about the origin of the digital assets and/or proof that the assets were not obtained through criminal means.

Account Suspension and Information Disclosure: Reserve the right to suspend any client related operations, and to report the incident along with all relevant information and documentation.

Identity Verification Requirements: Demand documents confirming the client's identity, physical existence, residential address, and financial solvency.

Controlled Asset Return: Return digital assets only to the source from which they were transferred, or to different accounts only after a comprehensive legal origin verification by ScapesMania's security service.

Third-party Withdrawal Restrictions: Deny client requests for fund transfers to third-party accounts without explanation.

Funds Withholding: Hold client funds until a thorough investigation of the incident is complete.

Transaction Chain Monitoring: Continuously monitor all transaction chains to identify suspicious activities.

Service Denial on Suspicion of Illicit Asset Origin: Retain the right to deny services to clients if there are justified suspicions regarding the legality of the digital assets' origins. In such cases, hold the funds in special ScapesMania accounts.

Extended Service Denial and Fund Withholding: Maintain the right to deny services and hold funds in special accounts if it's impossible to trace the entire chain of the digital assets' movement since their inception.