

# Bertes Invest OU AML policy

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Expi.trade provides to the customers fair, safe and reputable services. Expi.trade is regulated under Estonian Money Laundering and Terrorist Financing Prevention Act which is based on Directive (EU) 2015/849 of the European Parliament and of the Council. Under this regulation and according Expi.trade internal procedures we obligated to do our customers due diligence processes (KYC processes, transactions analysis, beneficial owner analysis, source of funds analysis, suspicious transactions monitoring and reporting, etc). By agreeing Expi.trade Terms of use you acknowledge and understand that Expi.trade may execute above mentioned processes without your prior notice and permission.

Expi.trade do not offer services to countries such as Afghanistan, Syria, Iran, North Korea, USA, Canada and the non-cooperative countries under FATF.

Expi.trade maintains three different customer verification levels, which depends on customer profile, customer provided information and ability to verify it, customer registration country, etc. Expi.trade may determine, at its sole discretion, the appropriate verification level for any user according our internal policies. Expi.trade may implement internal policies regarding verification level determination by nationality, country of residence, or other factors.

Expi.trade has two verification levels for individuals and one separate verification level for legal entities.

During verification we ask:

*-for individuals:*

**Identification document** (valid identification document issued in Estonia or a valid travel document issued in a foreign country, ID card).

\*Document must be valid.

\*Document must contains all your data written in Latin letters.

\*In case of documents submitting online, two pages (or two sides) of identity document must be pictured (in case of passport 1 page). The picture of identity document must be clear, with all corners visible, every detail readable, pictures must be without blur effect. Taking a picture of a picture is not accepted.

\*In some cases, we could ask for additional documents (in this case, you will receive an e-mail with a request for additional documents. You can send your documents to our e-mail: [support@expi.trade](mailto:support@expi.trade))

**Proof of address** (utility bill, bank statement, tax returns, council tax bills or government issued certifications of residence)

\*Accepted residence approval documents: utility bill for water/electricity/land line (but not mobile services)/ bank statement/ official government letters.

\*Document needs to be not older than 3 months from submitting day to us.

\*Document must show full name and full address of the individual, type of services provided and the date of the bill.

\*Document is accepted in your language.

\*In case of documents submitting online, taking a picture of a picture is not accepted.

\*The picture of proof of address must be clear, with all corners visible, every detail readable, pictures must be without blur effect. Taking a picture of a picture is not accepted.

\*In some cases, we could ask for additional documents (in this case, you will receive an e-mail with a request for additional documents. You can send your documents to our e-mail: [support@expi.trade](mailto:support@expi.trade))

## Selfie with identification document

- \*Please make selfie with your identification document in your hand.
- \*Identification document that you use for selfie must be the same as document that you provide as your identification document.
- \*Identification document must be visible.
- \*Picture must contain your face and your identification document.
- \*Make sure details on your frtn.trade profile matches the details in your documents.
- \*Accepted file formats: .jpg, .bmp, .png, .pdf
- \*The picture of selfie must be clear, with all corners of your identification document visible, every detail readable, pictures must be without blur effect. Taking a picture of a picture is not accepted.
- \*In some cases, we could ask for additional documents (in this case, you will receive an e-mail with a request for additional documents. You can send your documents to our e-mail: [support@expi.trade](mailto:support@expi.trade))

## Video identification

Based on Money Laundering and Terrorist Financing Prevention Act in Estonia, Expi.trade must identify a person and verify data with using information technology means where the application of the due diligence measures in establishing a business relationship does not take place in the physical presence of the person.

Currently video identification takes place during registration. When all the above mentioned documents are uploaded, video recording will take place. There a potential customer will have to reply on several questions. Recorded video will be reviewed in line with other documents of the client and the decision of account opening will take place based on them.

*-for legal entities:*

Expi.trade doesn't offer account opening for legal entities online. If you are legal entity and are interested in Expi.trade services you may submit documents for approval to [info@expi.trade](mailto:info@expi.trade) and we will send you legal entity customer questionnaire to complete.

Documents to submit:

Legal entity registration documents (e.g. actual statement from registry, articles of association, certificate of incorporation), company representative ID document + proof of residence, beneficial owner ID document + proof of residence, + source of funds confirmation, completed (and not signed yet) legal entity questionnaire, last financial statement, bank statement. We may ask additional proof of identification (in some cases).

You will be notified via e-mail about your onboarding status. Legal entity approval usually lasts one week (five working days).

After successful approval from Expi.trade compliance department, company legal representative will be invited with a meeting with Expi.trade authorised employee. Please take at the meeting above mentioned documents (documents must be in the original or authorised by notary), completed

and signed customer questionnaire. Expi.trade authorised employee may help you to fill the questionnaire.

You will be notified via e-mail, when your account is created in Expi.trade system.

After account creation, please make payment (minimum 1 EUR) from your company declared financial account. By this action your external financial account will be verified.

		Verification Level 1	Verification Level 2	Legal Entity
<b>requirement</b>	currency	Selfie + ID document + proof of residence, additional proof of identification (in some cases)+video identification	Selfie + ID document + proof of residence, additional proof of identification (in some cases)+video identification + source of funds confirmation, completed physical person full questionnaire.	Legal entity registration documents + company representative (Selfie + ID document + proof of residence, additional proof of identification (in some cases)), beneficial owner ID document + proof of residence, bank account details declaration and payment (1 EUR) from declared account + source of funds confirmation, legal entity questionnaire, last financial statement, bank statement
full Expi.trade questionnaire			requested	requested
online identification		yes	yes	only face to face identification
deposit (daily limit)	fiat	3000 EUR	20000 EUR	50000 EUR
	crypto	10000 EUR	50000 EUR	100000 EUR
deposit (monthly limit)	fiat	<15000 EUR (all time)	100000 EUR	300000 EUR
	crypto	<25000 EUR (all time)	200000 EUR	500000 EUR
Withdrawal (daily limit)	fiat	3000 EUR	20000 EUR	50000 EUR
	crypto	10000 EUR	50000 EUR	100000 EUR
Withdrawal (monthly limit)	fiat	<15000 EUR (all time)	100000 EUR	300000 EUR
	crypto	<25000 EUR (all time)	200000 EUR	500000 EUR

Expi.trade reserves the right to decline the account opening application at any stage without providing any reason or terminate any relationship with any customer for any reason (or for no reason) at any time.

Expi.trade reserves the right to ask for additional information from any customer, if it is required. Expi.trade reserves the right not to credit deposited funds or return the funds if the funds deposited from another (not from identified customer's) external financial account.

Funds withdrawal is possible only to verified customer's external financial account.