

Approved by the Decision
Board of Directors № 33 of 27
January, 2026



ENVOYS VISION DIGITAL EXCHANGE

POLICY

INTERNAL CONTROL ON COMBATING THE FINANCING OF CRIMINAL ACTIVITIES AND LEGALIZATION (LAUNDERING) OF CRIMINAL PROCEEDS

Open Joint-Stock Company

ENVOYS VISION DIGITAL CHANGE

Bishkek city



I. Introductory part (general provisions)

- 1.1. This Internal Control Policy (hereinafter referred to as the "Policy") of «ENVOYS VISION DIGITAL EXCHANGE» Open Joint-Stock Company (hereinafter referred to as the "Exchange Company") has been developed to familiarize clients, counterparties and partners with the principles and measures of the Exchange Company in the field of combating the financing of criminal activities and legalization (laundering) of criminal proceeds (hereinafter referred to as the "CFCA/LCD").
- 1.2. This Policy has been developed in accordance with:
- Law of the Kyrgyz Republic "On Combating the Financing of Criminal Activity and Legalization (Laundering) of Criminal Proceeds" dated August 6, 2018 No 87;
 - Decree of the Government of the Kyrgyz Republic No739 dated 14.11.2025. "On measures to implement the Law of the Kyrgyz Republic "On Combating the Financing of Criminal Activity and Legalization (Laundering) of Criminal Proceeds"
- 1.3. The Policy is a summary of the key provisions of the main Internal Control Program of the Exchange Company (hereinafter referred to as the "Program"), which is approved by the Board of Directors.
- 1.4. The main purpose of the Policy is to prevent the use of the infrastructure of the Exchange Company for the commission of offences related to money laundering and financing of terrorist or extremist organizations.
- 1.5. The Exchange Company operates on the basis of the "Know Your Customer" (KYC) principle and applies a risk-based approach in accordance with the Program.

II. Terms and Definitions

2.1. For the purposes of this Program, the following concepts are used:

Beneficial owner is an individual (individuals) who ultimately (through the chain of ownership and control) directly or indirectly (through third parties) owns the right of ownership or controls the client or an individual on whose behalf or in whose interests the transaction (transaction) is performed.

Verification is a procedure for verifying the identification data of the client and (or) the beneficial owner.

Identification of transactions subject to control and reporting is a stage of organization of internal control of the Exchange Company for the purposes of PFPD/LPD, which includes the determination of transactions subject to control and reporting to the authorized state body in accordance with the requirements of regulatory legal acts of the Kyrgyz Republic.

Business relations are relations between a client and a financial institution or a client and a non-financial category of persons, arising on the basis of an agreement (oral or written) on the provision of services for the implementation of an operation (transaction);

Identification is a procedure for establishing identification data about the client and (or) beneficial owner.

Client means a natural or legal person (organization), foreign trust or legal arrangement that has been serviced or serviced by a financial institution or a non-financial category of persons or with whom a financial institution or a non-financial category of persons establishes or has established a business relationship;

Operations (transactions) - any operations (transactions) with funds and/or financial instruments made to establish, change or terminate civil rights and obligations with funds and/or financial instruments;

Risk – the risk of financing criminal activity and legalization (laundering) of criminal proceeds;

Risk-based approach - the use of enhanced measures in the presence of a high level of risk or simplified measures in the presence of a low level of risk in accordance with the established risk management procedures (identification, assessment, monitoring, control, reduction of the degree of risk).

Funds - one of the following assets:

- a) cash and any financial assets, including virtual assets;

- b) property of any kind (tangible or intangible, movable or immovable) regardless of the method of acquisition;
- c) legal documents or instruments in any form, including electronic or digital, granting a right or interest in the above property or assets;
- d) Funds and (or) other property received/issued in accordance with Islamic principles of finance, cash and settlement checks, postal orders, shares, securities, bonds, dividends and income received from such funds or assets, or produced by them;

FATCA (Foreign Account Tax Compliance Act) is the Foreign Account Tax Compliance Act (FATCA Act), which is aimed at preventing tax evasion by residents of the United States of America. FATCA obliges foreign financial institutions to report to the IRS on the movement of funds of US taxpayers.

The FATF is an intergovernmental organization (group) for the development and implementation of international standards to combat money laundering and terrorist financing.

III. Customer Due Diligence (Know Yours Client)

3.1. The Exchange Company is obliged to identify and verify all clients before establishing a business relationship or in the process of carrying out certain transactions in accordance with the Program.

3.2. The customer due diligence procedure is carried out in the following cases:

establishment of business relations;

- a) performance of a one-time transaction in the amount that is equal to or exceeds 1,000,000 (one million) soms or the equivalent in foreign currency;
- b) electronic money transfer or transactions with virtual assets in the amount of more than 100,000 (one hundred thousand) soms;
- c) suspicion of financing criminal activities or money laundering, regardless of the amount of the transaction;
- d) the emergence of doubts about the reliability of previously obtained identification data.

3.3. In the process of identification of natural persons, the Exchange Company requires the provision of originals or notarized copies of documents that certify the identity and confirm the legality of stay in the country. The list of required documents is strictly regulated in accordance with the Program.

3.4. In the process of identification of legal entities, the Exchange Company collects and analyzes constituent documents, data on state registration, as well as information on the management structure and powers of persons who act on behalf of the organization.

3.5. The Exchange Company conducts mandatory identification of the beneficial owners of clients – legal entities.

3.6. Verification of the client's data must be completed within the time limits set by the Program (as a rule, within ten days in cases provided for a low level of risk).

IV. Procedure for determining the level of risk of the client

4.1. The Exchange Company applies a risk classification system that divides clients into groups with high, medium and low levels of risk in accordance with the Program.

4.2. The following criteria shall be taken into account when determining the level of risk:

- a) country affiliation of the client (availability of connections with high-risk countries or offshore zones);
- b) type of professional or economic activity;
- c) the nature and volume of transactions;
- d) the use of technologies that provide increased anonymity.

4.3. In relation to clients with a high level of risk, the Listing Company applies enhanced due diligence measures, which include:

- obtaining additional information about the source of funds;
- Updating your identity more frequently (at least once a year if the risks are identified as high)



- obtaining permission from the management to continue the business relationship;
- in-depth monitoring of all transactions.

4.4. The Exchange Company has the right to apply simplified verification measures to low-risk clients in the absence of suspicion of illegal actions in accordance with the Program.

V. Operations (transactions) subject to control and reporting

6.1. The Exchange Company constantly monitors the transactions of clients in order to identify transactions that do not have obvious economic sense or do not correspond to the usual nature of the client's activities.

6.2. In accordance with the Program, employees of the Exchange Company analyze transactions for their compliance with the signs of suspiciousness, which are established by the authorized state body.

6.3. The Exchange Company is obliged to inform the authorized state body about the detected suspicious transactions within three hours from the moment of recognition of the transaction as suspicious in accordance with the Program.

6.4. When trading and transactions with virtual assets, the Exchange Company prohibits the use of instruments that are aimed at hiding traces of transactions (mixers, anonymous wallets, coins with increased anonymity).

VI. Application of targeted financial sanctions

7.1. The Exchange Company is obliged to comply with the requirements of the legislation regarding the application of sanctions lists published by the authorized bodies.

7.2. In accordance with the Program, the Exchange Company immediately freezes transactions and funds of persons included in the Sanctions List of the Kyrgyz Republic or the Consolidated Sanctions List of the UN Security Council.

7.3. Notification of the freezing of funds shall be sent to the authorized state body within three hours from the moment of application of these measures without prior notice to the client.

VII. Denial of service and suspension of operations

8.1. An Exchange Company is obliged to refuse to open an account or conduct a transaction in the following cases:

8.1.1. failure by the client to submit documents that are necessary for identification;

8.1.2. submission of documents that contain inaccurate information;

8.1.3. there is a suspicion that the purpose of the transaction is to launder proceeds or finance criminal activities in accordance with the Program.

8.2. The Exchange Company has the right to suspend the execution of the client's order to carry out a transaction if this transaction is recognized as suspicious or if the client is included in the relevant lists of persons who are involved in criminal activity.

8.3. In accordance with the Program, the decision to refuse service or suspend the transaction entails sending a notification to the authorized state body within one business day.

VIII. Procedure for conducting training of employees of a Exchange Company on PFPD/LPD

9.1. The Exchange Company organizes training of employees in order to comply with the requirements of the legislation and the main Internal Control Program.

9.2. Personnel training includes introductory briefing upon hiring, scheduled classes and unscheduled training in case of changes in regulatory legal acts.

9.3. Scheduled training of employees is carried out at least once a year in accordance with the approved



schedule and the Program.

9.4. The Exchange Company annually sends the schedule of advanced training of personnel to the Training and Methodological Center of the authorized state body.

9.5. Assessment of the level of knowledge of employees in the field of CFCA/LCD is carried out annually. Employees with an insufficient level of training are sent for repeated training.

9.6. The Head of the Exchange Company is personally responsible for the organization and timeliness of personnel training in accordance with the Program.

IX. Final provisions

11.1. This Policy is a public document and is posted on the official website of the Exchange Company.

11.2. The Exchange Company has the right to make changes to this Policy in case of changes in the legislation of the Kyrgyz Republic or updating of the main Internal Control Program.

11.3. Clients of the Exchange Company, entering into business relations, confirm their consent to conduct verification procedures and undertake to provide reliable information and documents at the request of the Exchange Company in accordance with the Program.

11.4. This Policy is effective upon approval.

Chairman of the Board
ENVOYS VISION DIGITAL CHANGE
Shabdanov Almazbek Sultanbekovich



**Appendix 1 to the Regulation on the
Customer Verification Procedure**

STANDARD FORM

Questionnaire for Individuals

https://docs.google.com/document/d/1w40TPzFohuUvZFL3MhM2nIUDK-yMG4s_/edit

(edition 27.01.2026)

**Appendix 2 to the Regulation on the
Customer Verification Procedure**

STANDARD FORM

Questionnaire for Legal Entities

https://docs.google.com/document/d/1gaZh_Z5zoQVcgrhYf2RY4946qN5uWHZ1/edit?rtfpof=true&sd=true&tab=t.0

(edition 27.01.2026)

**Appendix 3 to the Regulation on the
Customer Verification Procedure**

(excluded due to incorporation into the above-mentioned questionnaires, edition 28.12.2023)

**Appendix 4 to the Regulation on the
Customer Verification Procedure**

(excluded due to incorporation into the above-mentioned questionnaires, edition 28.12.2023)

**Appendix 3 to the Regulation on the
Customer Verification Procedure**

STANDARD FORM

Questionnaire for Partners

https://docs.google.com/document/d/1hWwtTL27zft6vZOuo0dknFb2_on2z6c5/edit?rtfpof=true&sd=true&tab=t.0

(edition 27.01.2026)

Approved by the Board
Board of Directors 26 15 at
January, 2026



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