ANTI-MONEY LAUNDERING & COUNTER-TERRORIST FINANCING POLICY

Front-End Gatekeeping & Verification Framework

Effective Date: August 6, 2026 | **Doc Ref:** TS-AML-2026-V2

1. LEGAL FRAMEWORK & OPERATIONAL SCOPE

1.1. This Policy is enacted by **CERTECH BORROW s.r.o.** (IČO: 23706058) pursuant to Czech Act No. 253/2008 Coll., EU AMLD5/AMLD6, and FATF Standards.
1.2. **SaaS Architecture & Non-Custodial Role:** Certech Borrow s.r.o. operates strictly as a non-custodial software technology provider (SaaS UI Owner). Certech does not hold or manage user balances. All financial operations and digital asset exchanges are executed directly between end-users and regulated financial institutions via API connections. Certech's obligations are focused on front-end screening, geofencing, and maintaining UI gatekeeping integrity.

2. KYC VERIFICATION MATRIX & TRANSACTION LIMITS

Verification Level	Required Verification Scope	Operational Limits
Tier 1 (Basic)	Email, Phone Number, IP Geofencing, PEP & Sanction Pre-screening.	Up to €1,000 / day (View-only / Micro-transfers)
Tier 2 (Standard)	Government Photo ID + 3D Biometric Liveness (Sumsub Engine).	Up to €15,000 / month
Tier 3 (Enhanced / EDD)	Proof of Address (<90d) + Source of Funds / Source of Wealth Proof + MLCO Approval.	Custom Limits / High-Volume Processing

3. SANCTIONS SCREENING & GEO-BLOCKING

3.1. **Zero Tolerance:** Real-time automated cross-referencing against UN, EU, OFAC, UK HMT, and Interpol lists.
3.2. **Prohibited Jurisdictions:** Total automated geoblocking for FATF Blacklisted countries (DPRK, Iran, Myanmar), sanctioned regions (Crimea, Donetsk, Luhansk, Kherson, Zaporizhzhia, Cuba, Syria, Russia, Belarus), and non-licensed jurisdictions (USA, UK).

4. SUSPICIOUS ACTIVITY LOGGING & AUDIT TRAIL

All verification hashes, liveness logs, and IP metadata are logged and retained for **10 years**. Suspicious activities trigger immediate session termination and internal escalation to MLCO Anna Simeonova Anguelova.

APPROVED & ADOPTED BY EXECUTIVE MANAGEMENT:

Name: Anna Simeonova Anguelova | **Title:** Executive Director & MLCO

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