
ANTI-MONEY LAUNDERING (AML) &

COUNTER-TERRORIST FINANCING (CTF) COMPLIANCE PROGRAM**

Nummularius – Cryptocurrency Exchange Platform

Effective Date: January 7, 2026

Last Updated: January 7, 2026

PART I – INTERNAL AML / CTF COMPLIANCE PROGRAM

Confidential – Internal & Regulatory Use

1. Program Overview

Nummularius maintains a comprehensive Anti-Money Laundering (“AML”) and Counter-Terrorist Financing (“CTF”) Compliance Program designed to:

- Prevent the misuse of the Platform for money laundering, terrorist financing, sanctions evasion, or other illicit activities
- Comply with applicable AML / CTF laws, regulations, and regulatory guidance
- Protect the integrity of the Platform and the broader financial system

This Program is risk-based and proportionate to the nature, scale, and complexity of Nummularius’s operations.

2. Regulatory Framework

The Program is informed by, and aligned with, applicable laws and international standards, including:

- U.S. Bank Secrecy Act (BSA) principles
- Financial Action Task Force (FATF) Recommendations
- Applicable sanctions regimes (OFAC and equivalents)
- Jurisdiction-specific AML / CTF regulations where Nummularius operates or serves users

3. Governance & Oversight

3.1 Compliance Leadership

Nummularius appoints a designated **AML Compliance Officer (“AMLCO”)** responsible for:

- Program implementation and oversight
- Regulatory liaison
- Escalation and reporting of suspicious activity
- Periodic program review and updates

The AMLCO has sufficient authority, independence, and access to information.

3.2 Board & Senior Management Oversight

Senior management provides:

- Active oversight of AML / CTF risks
 - Adequate resources for compliance operations
 - Approval of material policy updates
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4. Risk Assessment

Nummularius conducts ongoing risk assessments considering:

- Customer risk (jurisdiction, profile, behavior)
- Product and token risk
- Transaction and delivery channel risk
- Geographic and sanctions exposure

Risk assessments are reviewed periodically and upon material changes to the business.

5. Customer Due Diligence (CDD)

5.1 Standard CDD

Prior to enabling trading or withdrawals, Nummularius collects and verifies:

- Legal name
 - Date of birth
 - Residential address
 - Government-issued identification
 - Contact information
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5.2 Enhanced Due Diligence (EDD)

EDD is applied to higher-risk users, including but not limited to:

- Politically Exposed Persons (PEPs)
- High-risk jurisdictions
- High-value or unusual transaction patterns

EDD measures may include additional documentation, source-of-funds inquiries, and enhanced monitoring.

6. Sanctions & Watchlist Screening

Nummularius screens users and transactions against:

- Sanctions lists
- Terrorist watchlists
- Law enforcement and regulatory alerts

Positive matches are escalated, investigated, and resolved before permitting activity.

7. Transaction Monitoring

Nummularius employs a risk-based transaction monitoring framework to detect:

- Unusual transaction patterns
- Structuring or layering behavior

- Rapid in-and-out movements
- Blockchain-related red flags

Monitoring includes automated tools and manual review processes.

8. Suspicious Activity Reporting

When suspicious activity is identified:

- Transactions may be delayed, restricted, or frozen
- Investigations are conducted internally
- Reports are filed with appropriate authorities where required by law

Users are **not notified** of suspicious activity reports unless legally permitted.

9. Recordkeeping

Nummularius maintains records relating to:

- Customer identification
- Transaction histories
- Compliance reviews
- Reports and investigations

Records are retained for legally required periods and secured against unauthorized access.

10. Training & Awareness

Employees with compliance-related responsibilities receive:

- Initial AML / CTF training
- Ongoing refresher training
- Updates on regulatory developments and typologies

Training is documented and reviewed periodically.

11. Independent Review & Testing

The AML / CTF Program is subject to:

- Periodic independent review
- Internal audits or third-party assessments

Findings are documented, and corrective actions are implemented promptly.

12. Enforcement & Disciplinary Measures

Violations of AML / CTF policies may result in:

- Internal disciplinary action
 - Termination of access
 - Regulatory reporting
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13. Program Updates

This Program is reviewed and updated regularly to reflect:

- Regulatory changes
 - Business expansion
 - Emerging risks
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PART II – PUBLIC AML / CTF COMPLIANCE SUMMARY

Public Disclosure – User & Partner Facing

1. Our Commitment

Nummularius is committed to maintaining a secure, compliant, and responsible digital asset trading environment. We do not tolerate the use of our Platform for money laundering, terrorist financing, or other illicit activities.

2. Identity Verification

To comply with AML / CTF laws, users may be required to complete identity verification, including:

- Government-issued identification
- Proof of address
- Additional verification for higher-risk accounts

Access to certain features may be restricted until verification is completed.

3. Transaction Monitoring

Transactions on the Platform are monitored to detect suspicious or unlawful activity. Where required by law, activity may be reported to authorities.

4. Sanctions Compliance

Nummularius does not provide services to individuals or entities subject to applicable sanctions or restrictions.

5. Account Restrictions

Accounts may be suspended, restricted, or closed if:

- Required by law
- Suspicious activity is detected
- Verification requirements are not met

Such actions may occur without prior notice where legally permitted.

6. Cooperation With Authorities

Nummularius cooperates with law enforcement and regulatory authorities in accordance with applicable laws and regulations.

7. User Responsibilities

Users agree to:

- Provide accurate and truthful information
 - Use the Platform lawfully
 - Comply with all applicable laws and regulations
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8. Contact Information

For AML / CTF compliance inquiries:

Nummularius – Compliance Department

 compliance@nummularius.com

 www.nummularius.com
