

Anti-money laundering Policy

Government policy and money laundering and terrorist financing risk management

Reflex Token SRL

Via E. De Nicola, n. 42, Cosenza, Italia C.F./P.I. 03767240785, following the introduction of the obligation to register in the special section of the register referred to in article 17-bis, paragraph 8-bis of Legislative Decree 13 August 2010, n. 141, for the subjects:

- provider and services related to the use of virtual currency

- digital wallet provider and services

per as defined in Article 1, paragraph 2, of Legislative Decree 231/2007 letters:

(ff) service providers relating to the use of virtual currency: any natural or legal person who provides to third parties, in a professional capacity including online, services functional to the use, exchange, storage of virtual currency and their conversion from or into legal tender currencies or into digital representations of value, including those convertible into other virtual currencies as well as issuing services; offer, transfer and clearing and any other service functional to the acquisition, trading or intermediation in the exchange of the same currencies;

(ff-bis) digital wallet service providers: any natural or legal person who provides, to third parties, on a professional basis, including online, private cryptographic key safeguard services on behalf of its customers, in order to hold, store and transfer virtual currencies;

I note that Reflex Token SRL is the owner of the Platform quasarwallet.com with services of holding, transfer and sale of cryptocurrencies for the benefit of third parties and the obligations imposed on this category of economic operators by Decree no. 231 of 2007.

Defines:

Measures to combat Riciclaggio operations

Money laundering, pursuant to the Anti-Money Laundering Decree, means:

1. the conversion or transfer of property, carried out knowing that it originates from a criminal activity or from a participation in such activity, for the purpose of concealing or concealing the illicit origin of the property itself or of helping any person involved in such activity to escape the legal consequences of his actions;
2. the concealment or concealment of the true nature, provenance, location, disposition, movement, ownership of the property or rights therein, carried out on the knowledge that such property originates from criminal activity or participation in such activity;

3. the acquisition, possession or use of property being aware, at the time of their receipt, that such property originates from criminal activity or participation in such activity;
4. participation in one of the acts referred to in points (a), (b) and (c), the association to commit that act, the attempt to commit it, the fact of helping, instigating or advising someone to commit it or facilitating its execution.

In relation to the risks associated with the phenomena of money laundering and terrorism, Reflex Token SRL responds responsibly, devoting the utmost attention to law enforcement and prevention tools.

Roles and responsibilities in AML

This document lists the tasks and responsibilities in the field of anti-money laundering of the corporate bodies of Reflex Token S.R.L for the purpose of mitigating the risk of involvement of the Company in acts of money laundering and / or terrorist financing.

Sole Director Reflex Token SRL

The sole director of Reflex Token SRL is responsible for defining the overall model of governance and management of the risk of money laundering and terrorist financing.

It is the sole administrator's task to approve this Policy and the organizational model for the governance and management of this risk.

In particular, the sole administrator shall:

- ✓ periodically develop guidelines and policies for the management of risks related to money laundering;
- ✓ illustrates the choices that Reflex Token SRL makes regarding internal procedures and controls, verification and storage of data, based on the actual exposure to the risk of money laundering (so-called anti-money laundering policy);
- ✓ establishes the principles for the management of relations with customers classified as "high risk" and;
- ✓ ensure the protection of confidentiality in the context of the procedure for reporting suspicious transactions;
- ✓ assess the risks resulting from operations with third countries associated with higher money laundering risks, identifying risk containment strategies and tools, including those targeting the exclusions referred to in point 6 of paragraph 6.

Anti-money laundering measures

Reflex Token SRL is committed to continuously spreading the culture aimed at the prevention and mitigation of money laundering and terrorist financing.

All this said, the action to prevent and combat money laundering and terrorist financing of Reflex Token SRL, is based on the following measures:

1. Adequate verification of the customers in the presence of the customer or the executor, consisting in the acquisition of the identification data provided by the customer upon presentation of a valid identity

document or other equivalent identification document, in compliance with Law no. 120/2020 of conversion, with amendments to Legislative Decree no. 76/2020, laying down urgent measures for digital simplification and innovation in the part relating to anti-money laundering legislation with particular reference to customer due diligence obligations. With regard to identification without the physical presence of the customer, provided for by Article 19, Legislative Decree no. 231/2007, the identification obligation is considered fulfilled for customers in possession of a digital identity with at least significant level of guarantee, or for customers who, after electronic identification, arrange a transfer to a payment account in the name of the Reflex Token SRL tenuto a the obligation to identify, provided that they are reports relating to payment cards and similar devices, as well as payment instruments based on telecommunications, digital or IT devices;

2. Recording of reports and operations (transactions) and computerized storage of the related supporting documents;
3. Adoption of organizational procedures and periodic internal control controls, based on reports;
4. Monitoring and reporting of suspicious transactions to the authorities appointed by law, if detected;
5. Staff training (online courses)
6. Exclusion of the platform of customers/consumers belonging to high-risk jurisdictions, with strategic deficiencies in their anti-money laundering and countering the financing of terrorism regimes (EU Regulation No 1675 of 2016 and subsequent amendments)