

LA VRAIE FRANCE
Anti-Money Laundering and Know
Your Customer Policy
BTX-COIN.COM

INTERNAL PROCEDURE FOR COUNTERACTING MONEY
LAUNDERING AND TERRORIST FINANCING UNDER FRENCH LAW,
IN ACCORDANCE WITH THE FRENCH ACT OF 1 MARCH 2018 ON
COUNTERACTING MONEY LAUNDERING AND TERRORIST
FINANCING, AS OF THE LATEST AMENDMENTS.

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Purpose of the Document

The purpose of this Anti-Money Laundering (AML) and Know Your Customer (KYC) policy is to establish comprehensive procedures and guidelines for detecting and preventing money laundering activities and terrorist financing in accordance with relevant French legal provisions. La Vraie France is dedicated to adopting a risk-based approach to counteract money laundering and terrorist financing, aligning with the legal requirements outlined in French legislation.

This policy encompasses rigorous procedures for customer due diligence, ongoing transaction monitoring, and reporting suspicious activities to the relevant authorities. La Vraie France is committed to ensuring that its AML and KYC policy remains in compliance with all applicable laws, regulations, and guidelines specified in French legislation, including guidance issued by regulatory bodies such as the French Financial Supervision Authority.

The company will conduct regular reviews and updates to this policy to ensure its alignment with the latest legal requirements and to reflect any changes in the guidance issued by regulatory authorities in France. La Vraie France will take proactive measures to counteract money laundering and terrorist financing, and this policy serves as an internal procedure to guide the company in fulfilling its obligations under French law related to Counteracting Money Laundering and Terrorist Financing.

Definition of Money Laundering in the Context of Cryptocurrency

Money laundering in the realm of cryptocurrency involves disguising the illegitimate origins of funds acquired through unlawful activities by making them appear to be derived from legitimate sources within the digital asset space. This process includes intricate transactions or movements across various cryptocurrency platforms, aiming to obscure the trail and make it challenging to trace the digital funds back to their illegal source. The use of cryptocurrencies in money laundering raises significant concerns, often linked to activities such as organized crime and terrorism, potentially impacting the integrity of the global financial system.

Cryptocurrency Regulatory Considerations in France:

In France, the regulation of cryptocurrency activities is governed by applicable laws and regulations. Key considerations for entities operating in the cryptocurrency space include:

AML and KYC Procedures:

Implementation of robust Anti-Money Laundering (AML) and Know Your Customer (KYC) procedures tailored for virtual asset transactions. This involves stringent customer due diligence, continuous transaction monitoring, and reporting of suspicious activities to authorities.

Compliance with French Law:

Adherence to the regulatory framework established by the French government for Virtual Asset Service Providers (VASPs), ensuring compliance with specific requirements related to virtual assets and the prevention of money laundering.

Data Protection:

Alignment with data protection laws in France to ensure the secure and private handling of user information, especially critical in the context of cryptocurrency transactions where sensitive data is involved.

Regular Updates:

Ongoing review and updates of AML and KYC procedures to align with the latest legal stipulations and guidelines issued by French regulatory bodies, facilitating a proactive response to evolving compliance requirements.

Collaboration with Regulatory Bodies:

Active engagement and cooperation with relevant regulatory bodies in France, such as the French Financial Supervision Authority, to stay informed about regulatory changes and to underscore a commitment to compliance.

Risk-Based Approach:

Adoption of a risk-based approach for the assessment and mitigation of potential money laundering risks associated with cryptocurrency transactions, reflecting an awareness of the dynamic nature of the digital asset landscape.

By understanding and embodying these definitions in operational practices, La Vraie France can contribute to the prevention of money laundering and the cultivation of a secure and compliant cryptocurrency environment within the French regulatory framework.

AML & CFT Policies & Controls

La Vraie France is dedicated to ensuring that all employees, regardless of their position within the organisation, actively engage in preventing the company's services from being

exploited by criminals and terrorists for money laundering purposes. This commitment is guided by the following objectives:

Compliance with all Anti-Money Laundering Act & Regulations of the jurisdictions in which we operates.

Mandatory reporting by all employees of potential instances in which La Vraie France its employees, facilities, or activities have been or are about to be used for money laundering, terrorist financing, or other illegal activity to the AML Compliance Officer.

Appointment of a AML Compliance Officer to oversee adherence to the La Vraie France AML & CFT Policies and Procedures.

Compulsory participation of relevant employees in anti-money laundering training sessions to ensure their awareness of their responsibilities under La Vraie France policies, procedures, and current developments in anti-money laundering legislation.

Protection of the company and its staff from the risks associated with breaches of the law, regulations, and supervisory requirements.

Preservation of the company's reputation and integrity by guarding against the potential for reputational damage resulting from implication in money laundering and terrorist financing activities.

It shall be the policy of this company that:

- Every member of staff shall fulfil their personal obligations commensurate with their role and position in the company. Commercial considerations and customer loyalty shall not take precedence over our firm commitment to anti-money laundering efforts. We shall conduct a comprehensive company-wide assessment of the risks related to money laundering and terrorist financing, implementing appropriate controls to effectively manage and mitigate the identified risks.

- La Vraie France will establish and maintain documented, proportionate policies and procedures, including controls, that outline the affirmative actions to be taken by staff to prevent money laundering and terrorist financing throughout their work.

Policy regarding the Anti Money Laundering Control Officer (AMLCO)

La Vraie France- Policy Regarding the Anti Money Laundering Control Officer (AMLCO)

Policy

It is the policy of La Vraie France that a Anti Money Laundering Control Officer (AMLCO) shall be appointed, and this individual shall hold a senior managerial position within the company, possessing sufficient professional experience and competence. La Vraie France shall promptly notify the appointment of the AMLCO to the relevant regulatory authorities and the cessation of their role as required.

Procedure

The AMLCO's role at La Vraie France is pivotal in coordinating and monitoring our Anti-Money Laundering (AML) activities and ensuring compliance with regulatory responsibilities on an ongoing basis. The AMLCO will also be responsible for the development and periodic updates of our AML policies, procedures, systems, controls, and training programs to remain aligned with legal requirements and best industry practices.

It is mandatory that all staff promptly report any suspicious activity or transaction that may be linked to money laundering or terrorist financing to the AMLCO. Furthermore, employees are encouraged to seek guidance from the AMLCO if they have any inquiries or concerns regarding our AML policies or procedures.

Responsibilities of the AMLCO include the following:

- Conducting comprehensive risk assessments of our customers, products, services, delivery channels, and geographic locations.
- Establishing robust customer due diligence measures to verify the identity, background, and purpose of our customers.
- Implementing internal controls and ongoing monitoring mechanisms to effectively detect and prevent money laundering.

- Providing regular AML training to relevant staff to ensure a clear understanding of their obligations and responsibilities.
- Receiving and carefully reviewing reports of suspicious activity from staff.
- Reporting any suspicious activity or transaction to the appropriate authorities in a timely and efficient manner.
- Coordinating enhanced due diligence procedures for high-risk customers.
- Responding to both internal and external inquiries regarding our AML policies and procedures.
- Cooperating fully with law enforcement or regulatory agencies in the event of inspections or investigations.

AML training program for staff

La Vraie France- Policy for AML Training Program for Staff

Policy

At La Vraie France, we are committed to maintaining the highest standards of integrity and compliance. To ensure this, we have established the following policies:

- Recruitment of all staff will include thorough screening procedures to ensure that we hire individuals who meet our high standards.
- All employees shall receive Anti-Money Laundering (AML) and Counter Financing of Terrorism (CFT) training to ensure that their knowledge and understanding is at an appropriate level. Ongoing training, at least annually, will be provided to maintain awareness. The training program shall align with the requirements of the Fintrac and its implementing regulations, as well as the global standards.
- Employees who have customer contact or access to personal data relating to clients shall receive training on data protection laws to ensure their knowledge and understanding is at an appropriate level. Ongoing training, at least annually, will be provided to maintain awareness and ensure compliance with the company's legal obligations.

- All employees are required to confirm their awareness of the contents of this Compliance Manual by signing the acknowledgment form annually, or more frequently, as required by the Anti Money Laundering Control Officer (AMLCO).
- TheAMLCO shall ensure that training is provided to employees based on their exposure to money laundering risk. TheAMLCO will verify that training has been undertaken and that employees have achieved an appropriate level of knowledge and understanding. Additionally, theAMLCO will assess the effectiveness of the training program and maintain records of training activities.
- TheAMLCO shall monitor and manage the risks associated with agents or third parties who perform services on behalf of La Vraie France. TheAMLCO will ensure that these entities have adequate AML/CFT controls in place and comply with applicable laws and regulations.

Procedure

All employees are required to:

- Undertake training programs on anti-money laundering policies and procedures at a time specified by the AMLCO.
- Receive training on recognizing and dealing with transactions that may be related to money laundering.
- Promptly escalate and report any suspicious activity or transaction to theAMLCO using a Suspicious Activity Report (SAR) form.
- Familiarise themselves with the Anti-Money Laundering Act & Regulations.

TheAMLCO will:

- Evaluate alternative AML/CFT training methods, products, and services to provide suitable training activities for employees with different roles and responsibilities within La Vraie France.
- Provide regular updates on changes or developments in AML/CFT laws, regulations, guidance, best practices, risks, typologies, and red flags.
- Conduct periodic tests or quizzes to verify employees' knowledge and understanding of AML/CFT policies and procedures.
- Maintain records of employee attendance, completion, and performance in AML/CFT training activities, securely storing them for at least five years.

- Review the effectiveness of the AML/CFT training program annually or more frequently if needed, making necessary adjustments or improvements based on feedback, results, or changes in the risk profile.

Customer due diligence

La Vraie France diligently applies customer due diligence measures for all business transactions, including the onboarding process for employees and clients. Continuous monitoring of transactions and activities is conducted to promptly detect any suspicious events. In our commitment to meeting KYC (Know Your Customer) and AML (Anti-Money Laundering) requirements, we have seamlessly integrated advanced identity verification and AML screening tools for efficient compliance. Moreover, for transaction monitoring, we leverage the capabilities of these advanced tools, ensuring comprehensive oversight and compliance with regulatory standards. This strategic implementation enhances our ability to maintain the highest standards of security, compliance, and efficiency throughout our operations.

Types of customer due diligence:

- Basic customer due diligence (BCDD)
- Simplified customer due diligence (SCDD)
- Enhanced customer due diligence (ECDD)

Basic customer due diligence (BCDD)

La Vraie France- will initiate the necessary verification process by obtaining the following information from the customer:

- Name
- Date of birth
- Address
- Email address

To verify the customer's identity the customers/clients shall be asked to provide either of the following documents:

- Identity Card
- Driving Licence
- Passport

Simplified customer due diligence (SCDD)

If the customer's risk assessment seems to require further checks then they are required to provide further information which include:

- Name
- Date of birth
- Address
- Citizenship and residence
- Utility Bill under persons name on same address as provided on ID document
- Copy of ID document or Passport
- Background screening and checking of affiliation to any PEP (Politically exposed person)

Enhanced customer due diligence (ECDD)

- Name
- Date of birth
- Address
- Citizenship and residence
- Utility Bill under persons name on same address as provided on ID document
- Copy of ID document or Passport
- Background screening and checking of affiliation to any PEP(Politically exposed person)
- Source of income
- Country risk level

- UBO check
- Transaction monitoring

Transaction Monitoring

In adherence to the regulations stipulated by the relevant authorities in France, La Vraie France, a registered Virtual Asset Service Provider (VASP) in the country, has implemented a vigilant transaction monitoring system. Tailored to actively scrutinize customer transactions for potential signs of money laundering or terrorist financing, La Vraie France employs predefined thresholds, scenario-based monitoring, and customer behavior profiling to identify anomalies in real-time.

The company is committed to thorough investigations and the generation of Suspicious Transaction Reports (STRs) in line with French regulatory mandates. By emphasizing meticulous documentation, ongoing system refinement, staff training, and strict adherence to regulatory guidelines, La Vraie France ensures that its transaction monitoring efforts not only remain robust and effective but also align seamlessly with France's regulatory expectations, contributing to the overall security and integrity of the French financial system.

Ongoing Monitoring

Ongoing monitoring of clients is an integral aspect of our AML/CFT compliance policy at La Vraie France. We consistently monitor our clients' transactions and activities using various tools and techniques to detect any suspicious activity. If any red flags are identified, we will promptly report the customer or prospect to the appropriate regulatory authorities, freeze their accounts, and secure their funds in accordance with the EU and French Financial Conduct Authority, along with other applicable regulations.

The ongoing monitoring process involves risk-based assessments of the client's activities, taking into consideration the nature and purpose of their business relationship with La Vraie France. Records of all transactions, including the amount and type of funds involved and the parties engaged in the transaction, will be diligently maintained. These records will be retained for a minimum of five years after the conclusion of the business relationship or account, as mandated by relevant laws and regulations.

Data Retention

Our record-keeping procedures encompass comprehensive documentation of financial transactions, customer due diligence information, and any other relevant data, ensuring compliance with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) regulations in France and the broader EU context. The retention period will adhere to the stipulations of both regions, with a minimum duration of five years, ensuring that La Vraie France remains in strict compliance with regulatory requirements.

This commitment ensures that the company is well-prepared to promptly provide pertinent information if requested by regulatory authorities in France, the EU, or any other relevant jurisdiction. Thorough and accurate record-keeping is crucial for demonstrating transparency, accountability, and a commitment to preventing money laundering and terrorist financing activities. La Vraie France remains dedicated to upholding these standards and contributing to the overall integrity of the financial system.

Staff Training at La Vraie France

Employee training at La Vraie France is a fundamental element of our commitment to maintaining the highest standards of anti-money laundering (AML) compliance and financial integrity. We recognize that our employees play a crucial role in upholding regulatory standards and combating financial crimes, including money laundering. Here's an overview of our tailored employee training program at La Vraie France.

At La Vraie France, we prioritize clarity and depth in AML training. Our employees undergo comprehensive training programs meticulously crafted to provide them with an in-depth understanding of AML regulations, policies, and procedures. This includes a thorough exploration of topics such as recognizing red flags of potential money laundering, understanding evolving regulatory requirements, and appreciating the significance of compliance in the crypto industry.

The crypto landscape is dynamic, and so are AML regulations. To keep our employees well-informed, we regularly update our training modules, ensuring that they stay abreast of

the latest developments in AML regulations. This commitment ensures that our compliance efforts are always aligned with the most current standards in the crypto space.

Our training philosophy goes beyond theory; we prioritize practical, scenario-based learning. Real-life situations and crypto-specific case studies are presented to our employees, allowing them to apply their AML knowledge in practical contexts. This approach enhances their ability to identify and address potential AML concerns within the unique challenges of the crypto industry.

Recognizing the varied responsibilities in different roles within our organization, we customize our training programs to be role-specific. Employees in different positions receive training that is directly relevant to their job functions, ensuring they are well-prepared to fulfill their AML responsibilities effectively in the context of the crypto sector.

Assessments and certifications are integral to our training process to gauge the effectiveness of our programs. Employees are required to demonstrate their understanding of AML principles through assessments, and upon successful completion, they receive certifications that validate their AML knowledge and readiness for the crypto environment.

Our training also emphasizes the importance of reporting and escalation procedures specific to the crypto industry. Employees are trained on how to report suspicious activities and potential AML concerns, as well as the proper channels for escalation within the organization, considering the unique challenges and opportunities presented by the crypto space.

Threshold Monitoring

La Vraie France, as a leading participant in the dynamic and innovative field of cryptocurrency, places paramount emphasis on maintaining the highest standards of anti-money laundering (AML) compliance. A crucial component of this commitment is the meticulous threshold monitoring system, a multifaceted process designed to scrutinize transactions exceeding the €10,000 threshold. This comprehensive approach not only aligns with the stringent AML regulations of the European Union (EU) and French law but also

reflects La Vraie France's proactive stance in combating financial crimes within the cryptocurrency sector.

The threshold monitoring system implemented by La Vraie France ensures that transactions surpassing the specified limit undergo rigorous scrutiny and analysis. This proactive approach is in line with the regulatory expectations set forth by both the EU and French authorities. By closely monitoring transactions that exceed the €10,000 threshold, La Vraie France aims to promptly detect and address any potential risks associated with money laundering or other illicit financial activities.

This commitment to robust threshold monitoring not only enhances the overall AML compliance framework but also underscores La Vraie France's dedication to fostering a secure and transparent environment within the cryptocurrency sector. Through these measures, the company contributes to the integrity of financial systems and the prevention of unlawful financial practices within the EU and France.

Regulatory Compliance and Adaptation:

La Vraie France acknowledges the ever-evolving nature of the cryptocurrency landscape and the corresponding regulatory environment. To ensure robust compliance, the company diligently follows AML directives set forth by the EU and French regulatory bodies. This involves continuous monitoring of regulatory updates, amendments, and industry best practices. La Vraie France's commitment to staying abreast of these changes ensures that its threshold monitoring practices are not only compliant but also reflective of the latest standards and expectations in the crypto space.

Transaction Reporting Requirements:

Transactions surpassing the €10,000 threshold trigger a meticulous reporting process at La Vraie France. The company adheres to the specific reporting requirements outlined by the EU and French AML regulations. This includes the timely submission of Suspicious Transaction Reports (STRs) or any other relevant filings to the appropriate regulatory authorities. By

meeting these reporting obligations, La Vraie France plays a crucial role in the broader effort to detect and deter potential illicit financial activities within the cryptocurrency sector.

The reporting process is characterized by prompt and accurate submissions to regulatory authorities, providing essential information regarding transactions that may raise suspicions of money laundering or other illicit financial activities. La Vraie France's commitment to adhering to these reporting requirements underscores its dedication to transparency, compliance, and the overall integrity of financial systems in both the EU and France.

By actively participating in the reporting process, La Vraie France contributes to the collective efforts aimed at identifying and mitigating risks associated with financial crimes within the cryptocurrency sector. This commitment aligns with regulatory expectations and reinforces the company's role in maintaining a secure and accountable financial environment.

Comprehensive Review Process:

La Vraie France comprehensive review process is executed by a dedicated team of AML specialists. When a transaction surpasses the €10,000 threshold, it automatically initiates a detailed examination. This multifaceted review goes beyond a surface-level assessment, delving into transaction details, customer profiles, and the intended purpose of each transaction. The objective is not only to assess the legitimacy of the transaction but also to identify any nuanced patterns or anomalies that may warrant further scrutiny.

Identification of Red Flags:

La Vraie France has identified specific red flags that accompany transactions surpassing the €10,000 threshold. These red flags serve as indicators of potential suspicious activity and include:

Frequent Transactions Below Threshold:

Monitoring patterns of transactions deliberately kept just below the reporting threshold, indicating a potential effort to evade detection.

Transactions with New Customers:

Heightened scrutiny is applied to transactions involving customers with no substantial transaction history, recognizing that such cases may pose an elevated risk.

High-Risk Jurisdictions:

Transactions linked to jurisdictions with a high risk of financial crimes trigger additional investigation, reflecting La Vraie France commitment to mitigating risks associated with specific regions.

These red flags provide a nuanced framework for assessing transactions and contribute to La Vraie France ability to identify and address potential AML concerns in the cryptocurrency sector.

Enhanced Customer Due Diligence (CDD):

La Vraie France goes above and beyond standard customer due diligence for transactions surpassing the €10,000 threshold. This involves a rigorous process of verifying the customer's identity through multiple channels and scrutinizing the source of funds involved in the transaction. By adopting an enhanced CDD approach, La Vraie France ensures strict compliance with the stringent EU and French AML/CFT regulations, mitigating risks associated with identity fraud and illicit fund flows.

Suspicious Activity Reporting (SAR):

If the review process reveals any suspicious activity or triggers red flags, La Vraie France takes prompt and decisive action by filing a detailed Suspicious Activity Report (SAR) with the relevant regulatory authorities. These reports go beyond mere transaction details; they include a comprehensive analysis of the identified concerns, providing regulators with valuable insights. La Vraie France proactive approach to filing SARs underscores its commitment to addressing and reporting potential financial crimes promptly.

Continuous Monitoring and Adaptation:

Recognizing the dynamic nature of the cryptocurrency industry and the evolving regulatory landscape, La Vraie France has established a robust system for continuous monitoring and adaptation. Regular updates to the threshold monitoring procedures ensure that the company's compliance efforts remain agile and aligned with the latest standards set forth by EU and French authorities. This forward-thinking approach allows La Vraie France to stay ahead of emerging challenges and proactively adjust its practices to address new risks within the cryptocurrency sector.

Continuous Monitoring

At La Vraie France, we prioritise anti-money laundering (AML) compliance through continuous review. This process involves real-time or near-real-time monitoring of transactions, enabled by advanced automated systems and sophisticated software. Our main goal is to swiftly identify unusual or suspicious transaction patterns and activities, ensuring rapid responses and adherence to regulatory standards. Our vigilance begins the moment a transaction is initiated and continues until its completion, leaving no room for complacency. We've invested in cutting-edge technology and automation to efficiently process and analyse substantial data volumes, enabling us to detect anomalies and red flags. Pattern recognition, driven by advanced algorithms, aids in identifying transactions requiring further scrutiny. The generation of alerts is a crucial part of our process, prompting thorough investigations conducted by our experienced compliance professionals. Our adaptability and learning

capacity ensure that our systems continually improve at recognizing emerging patterns of illicit financial activities, enhancing our overall AML effectiveness.

Pattern Recognition

Pattern recognition is a major core of our continuous review process at La Vraie France, where we employ sophisticated algorithms within our monitoring systems. These advanced algorithms cast a wide net, taking into account an array of transaction variables, including transaction amounts, frequencies, customer profiles, and even external data sources. This multifaceted approach enables us to swiftly and accurately identify deviations from established behavioural norms. By scrutinising these factors collectively, we can quickly flag transactions that exhibit behaviour outside the expected parameters.

For instance, these algorithms can detect irregularities such as unusually high transaction amounts, a sudden surge in transaction frequency, or transactions involving customers whose profiles have notably changed. Furthermore, the integration of external data sources allows us to cross-reference and validate transaction information against broader financial trends and risk factors. This meticulous examination goes beyond the surface and enables us to separate legitimate transactions from those that warrant further scrutiny. In essence, our pattern recognition capabilities serve as the first line of defence in identifying potentially suspicious activities, thereby contributing significantly to the efficacy of our anti-money laundering (AML) compliance efforts.

Alert Generation

Alert generation is a vital component of our transaction monitoring process at La Vraie France. When our vigilant monitoring system detects transactions that deviate from established norms or exhibit red flags, it promptly initiates the generation of alerts. These alerts serve as the initial trigger for further investigation and scrutiny. They can be triggered for a variety of reasons, encompassing a spectrum of potential concerns. For instance, our system may flag transactions involving unusually high monetary amounts that exceed typical thresholds. It's equally sensitive to high-risk counterparties or counterparties located in regions associated with increased financial risk. Moreover, our monitoring system can also react to abrupt and significant shifts in transaction behaviour. These alerts are a crucial early

warning system that enables our team to swiftly assess potentially suspicious activities and determine the appropriate next steps, including the possible filing of Suspicious Activity Reports (SARs) as mandated by regulatory standards. This multi-tiered approach to alert generation empowers us to proactively address potential AML concerns and maintain the integrity and security of our financial operations.

Escalation and Investigation

At La Vraie France, we've established a well-structured escalation process to manage alerts generated through our continuous review system. Our dedicated team of compliance professionals takes the helm when alerts arise. They delve deep into the specifics of each alert, leaving no stone unturned. This meticulous review includes examining the details of the alert, collecting additional information, and conducting comprehensive investigations to ascertain the nature of the transaction in question. Their objective is to determine whether further action is warranted, such as the submission of a Suspicious Activity Report (SAR). This meticulous approach ensures that our responses are thorough and in accordance with regulatory standards, underlining our commitment to maintaining financial integrity and security.

Adaptability and Learning

Our continuous review systems are inherently designed to evolve and adapt based on previous experiences. As they accumulate more data and encounter various scenarios, they become increasingly proficient at recognizing emerging patterns of illicit financial activities. This adaptability is a core strength of our AML compliance strategy, enhancing our overall capabilities. Over time, the software fine-tunes its ability to spot suspicious activities, providing us with an ever-improving line of defence against money laundering and other financial crimes. This adaptability reflects our ongoing dedication to staying at the forefront of AML compliance.

Compliance Reporting

The role of continuous review in our AML compliance efforts extends to the vital function of reporting. When a transaction is flagged as suspicious, our monitoring system seamlessly

generates the required documentation for regulatory reporting. This includes the preparation of SARs and other mandated reporting requirements. Our commitment to regulatory standards ensures that we fulfil our responsibility to report potential financial crimes, thereby safeguarding the integrity and security of the financial system. This aspect of continuous review underscores our unwavering dedication to maintaining transparency and regulatory compliance in our financial operations.

Data collection

Data collection and management are fundamental aspects of our compliance efforts at La Vraie France. We have implemented robust systems and procedures to ensure that we gather, organise, and maintain a comprehensive repository of data related to our business operations. Here's an expanded overview of how we manage this critical component:

Data Sources: We cast a wide net when it comes to data sources. We collect information from various departments and aspects of our business, including but not limited to:

Financial Transactions: These records encompass details of every financial transaction, such as invoices, receipts, payroll records, and budget allocations.

Customer Interactions: We keep records of all interactions with customers, be it in-person meetings, phone calls, emails, or any other form of communication. This helps us maintain a history of customer engagements and ensures a personalised approach.

Regulatory Filings: We meticulously track all regulatory filings and submissions to ensure they are accurate, complete, and submitted on time. This includes tax filings, compliance reports, and any other submissions required by regulatory bodies.

Compliance-Related Activities: Any activity directly related to compliance, such as employee training sessions, internal audits, risk assessments, and policy updates, is documented and tracked.

Data Security: Data security is a top priority at La Vraie France. We implement state-of-the-art security measures to protect the confidentiality, integrity, and availability of our data. Access controls, encryption, and regular security audits are some of the techniques employed to safeguard sensitive information.

Data Retention: We maintain data retention policies that align with legal requirements and industry standards. This ensures that we retain data for the necessary duration while also disposing of it responsibly when it is no longer required. We keep data for 5 years as per EU rules.

Data Accessibility: While security is paramount, we also ensure that data is easily accessible to authorised personnel. This accessibility is crucial for timely analysis and reporting. We employ user authentication and authorization mechanisms to grant access only to those who need it.

Data Quality and Accuracy: We emphasise the accuracy and quality of the data we collect. Routine data validation and cleaning processes are implemented to correct errors and inconsistencies. This helps ensure that the data is reliable for analysis and reporting.

Version Control: For documents and records that may undergo revisions, we implement version control procedures. This guarantees that we can track changes and have access to historical data when necessary, especially for regulatory compliance documentation.

Data Backup and Disaster Recovery: To protect against data loss due to unexpected events, we have comprehensive data backup and disaster recovery plans in place. This ensures that even in the face of unforeseen circumstances, our data can be restored and operations can continue without major disruptions.

Audit Trails: We maintain audit trails for critical data changes and access. These logs allow us to track who has accessed or modified data, contributing to data transparency and accountability.

Regular Data Analysis

At La Vraie France, the compliance team conducts regular and systematic data analysis as part of our ongoing commitment to maintaining a compliant and risk-aware organisation. This process is not limited to mere data review; it involves a structured and methodical approach to leverage the wealth of information in our records.

Data Variety: Our data analysis encompasses a wide variety of data sources, ranging from transaction records and customer interactions to regulatory filings and compliance-related activities. This inclusive approach ensures that we capture a holistic view of our operations.

Advanced Analytics: We employ advanced analytics tools and techniques, such as data mining, machine learning, and statistical analysis, to delve deeper into the data. These methods help uncover intricate relationships, dependencies, and insights that might not be apparent through traditional methods.

Pattern Recognition: Our compliance professionals excel in recognizing patterns, trends, and anomalies within the data. This keen eye for detail enables us to identify subtle shifts in our operations that may indicate potential compliance risks, emerging issues, or areas in need of improvement.

Trend Identification: Identifying trends in our data is crucial for proactive risk management and resource allocation. By scrutinising the data, we are able to gain a deeper understanding of our compliance landscape.

Product and Geographic Trends: We use our data analysis to identify trends in specific product lines or geographic regions. For example, we may detect that compliance concerns are more prevalent in certain product categories or markets. This information empowers us to focus our efforts on these high-risk areas and tailor our strategies accordingly.

Shifts in Customer Behaviour: We also keep a close eye on changes in customer behaviour and preferences. This helps us align our compliance strategies with evolving customer demands, ensuring that we continue to provide a seamless and compliant customer experience.

Risk Assessment: Once we have identified trends and potential compliance risks, our next step is to assess the associated risks. This evaluation process is pivotal in helping us prioritise and address issues promptly.

Impact and Likelihood Analysis: Our compliance professionals perform thorough risk assessments to determine both the potential impact and likelihood of identified compliance issues. This enables us to categorise risks based on severity and prioritise them accordingly.

Risk Scenarios: We create risk scenarios that help us envision potential compliance breaches or issues. By doing so, we are better prepared to develop mitigation strategies and allocate resources effectively.

Training and Safeguard Implementation: Data-driven insights are at the heart of our approach to training and safeguard implementation. When we identify specific areas in need of attention, whether due to emerging risks or trends, we take a proactive approach to enhance our compliance measures.

Tailored Training Programs: We design and deliver targeted training programs for our employees based on the data analysis results. These programs are customised to address specific compliance concerns and are aimed at equipping our workforce with the knowledge and skills required to adhere to regulatory standards.

Safeguard Development: We work to develop and implement additional safeguards or processes to mitigate identified risks. These safeguards may include enhanced security measures, updated policies and procedures, or technological solutions to address emerging compliance challenges.

Suspicious Activity reporting

Identification of Suspicious Activity

La Vraie France has established comprehensive transaction monitoring systems and a vigilant compliance team responsible for identifying suspicious activities or transactions. Suspicious

activities can encompass a wide range of behaviours, including but not limited to unusual financial transactions, potential money laundering, fraudulent activities, or violations of regulatory requirements.

Internal Review

In the process of handling a Suspicious Activity Report (SAR), the La Vraie France internal Anti-Money Laundering (AML) department conducts an initial review of the case. This step is crucial for assessing the validity of the SAR and determining whether further action, such as reporting to regulatory authorities, is necessary. Here's an outline of the internal review process:

Receipt of SAR

The AML department receives the SAR from the reporting employee or compliance officer.

Initial Assessment

A designated AML specialist or team evaluates the SAR to determine its credibility and significance. They assess the following factors:

- The accuracy and completeness of the information provided.
- The severity of the suspicious activity.
- Whether the activity appears to violate any relevant laws or regulations.
- Customer Profile Analysis: AML experts review the customer's profile, transaction history, and other relevant data to determine if the activity is unusual based on their typical behaviour.

Risk Analysis

A risk assessment is conducted to gauge the potential risks associated with the reported activity. Factors such as the customer's risk level, the type of transaction, and the nature of the suspicion are considered.

Documentation Review

The AML team verifies the completeness of supporting documentation and evidence. Any missing or additional documents are noted.

Initial Decision

Based on the initial review, the AML department decides whether the SAR is valid and requires further action. There are four typical outcomes:

Proceed with Reporting: If the SAR is considered valid and indicates a substantial risk of financial crime, it proceeds to the next steps, including reporting to the appropriate regulatory authority.

Request Additional Information: In some cases, additional information or documentation may be needed to make a definitive decision. We may contact the reporting employee for more details.

Close Case: If the SAR is determined to be unsubstantiated or does not pose significant risks, the case may be closed. In such instances, a detailed explanation of the decision is documented for compliance purposes.

Communication: The AML department communicates its decision to the reporting employee and any other relevant parties involved in the process.

Decision to File

After the internal review, Team determines whether to file a Suspicious Activity Report (SAR) due to the large cash deposit:

- Review Internal Findings: Assess findings from the internal review.
- Consider Regulatory Requirements: Review SAR filing thresholds and regulatory obligations.
- Risk Assessment: Evaluate potential risks associated with the suspicious activity.
- Alignment with AML Policies: Ensure compliance with internal AML policies.
- Decision Outcome: Decide to either file the SAR or not:
- Proceed with SAR Filing: If the activity meets reporting criteria, prepare for filing.
- Do Not File the SAR: If it doesn't meet criteria, document the decision.

- Documentation: Record the decision and rationale for compliance and audit.
- Communication: Inform the decision to relevant parties.

Risk Assessment

Risk Factors

High Risk Factors

Customer Risk Factors

1. Unusual Business Relationship:

La Vraie France should exercise caution when dealing with clients in unconventional or suspicious circumstances.

2. Geographical Risk:

Given the nature of cross-border payments, it's essential to identify high-risk geographical areas, particularly those with weak anti-money laundering (AML) and counter-terrorist financing (CTF) controls.

3. Legal Persons or Asset Holding Arrangements:

Be vigilant when dealing with legal entities that may serve as vehicles for holding personal assets. Such arrangements could potentially be used for illicit purposes.

Business Risk Factors

High Risk Factors

1. Non-Face-to-Face Transactions:

Special attention is needed for non-face-to-face transactions, especially if electronic signatures are involved, to ensure their authenticity.

2. Payments from Non Associated Third Parties:

Payments from unknown or unassociated third parties should be closely monitored to prevent money laundering or terrorist financing.

3. New Products, Practices, or Technologies:

Any introduction of new products, business practices, or technologies should be assessed for AML and CTF risks.

4. Nominee Directors or Shadow Directors:

If La Vraie France provides services involving nominee directors, nominee shareholders, or shadow directors, these should be scrutinised for potential risks.

Geographical Risk Factors

1. Countries with Ineffective AML/CTF Systems:

Identify and avoid dealing with countries that credible sources have identified as having ineffective systems to counter money laundering or terrorist financing.

2. Countries with High Corruption and Criminal Activity:

Exercise caution when operating in countries with significant levels of corruption, terrorism, money laundering, and illicit drug production and supply.

3. Countries under Sanctions:

Comply with sanctions, embargoes, or similar measures issued by relevant international bodies like the African Union, European Union, or the United Nations.

4. Countries Supporting Terrorism:

Be vigilant when dealing with countries providing funding or support for terrorism.

5. Countries with Proscribed Organizations:

Avoid dealing with countries where organisations within their territory have been designated as proscribed organisations under relevant laws.

6. Countries Non-Compliant with AML/CTF Recommendations:

Pay attention to reports by international bodies or non-governmental organisations identifying countries that do not implement AML and CTF requirements consistent with global recommendations.

Low Risk Factors

Customer Risk Factors:

Public Administration or Publicly Owned Enterprise:

Customers falling into the category of public administration or publicly owned enterprises are generally considered lower risk.

Individual Resident in a Lower-Risk Area:

Customers who are individual residents in geographical areas with lower risk, as detailed below, are typically associated with reduced risk.

Geographical Risk Factors

- Countries or states with a known and established record in AML and CTF measures are generally categorised as lower risk.
- Dealing with customers or entities from third countries with effective systems to counter money laundering and terrorist financing is usually lower risk.
- Operating in third countries identified by credible sources as having low levels of corruption, terrorism, money laundering, and drug production and supply typically represents lower risk.
- Third countries that align with the revised Recommendations published by the Financial Action Task Force (FATF) and effectively implement these recommendations, as determined by credible sources, are considered lower risk.

Policy Updation & Compliance

The CEO and Board of Directors of La Vraie France are the highest authorities and are responsible for the implementation and ongoing maintenance of the Anti-Money Laundering (AML) policy. They are also responsible for ensuring that the policy is kept up-to-date and for making any improvements as required by law. By having the Demangel Damien and Board of Directors as the key authorities for the AML policy, La Vraie France is committing to the highest level of accountability and oversight for the policy's effectiveness.


In addition, La Vraie France has appointed **the CEO** as compliance officer to ensure that the AML policy is implemented effectively and in accordance with all relevant laws and regulations. The compliance officers will be responsible for monitoring the companies activities and transactions, ensuring that all employees are trained on AML compliance, and reporting any suspicious activity or potential violations of the AML policy to the appropriate authorities.

The compliance officers will also be responsible for conducting regular internal audits and assessments to ensure compliance with the policy and applicable laws, regulations, and guidelines. Any deficiencies identified during these audits will be promptly addressed and

corrected by the compliance officers and relevant departments. By appointing dedicated compliance officers, La Vraie France is demonstrating its commitment to preventing money laundering and other financial crimes, and ensuring the integrity of its financial systems.

Signed By DEMANGEL DAMIEN (CEO)

Date 2024/02/1

A handwritten signature in black ink, appearing to read 'Damien Demangel', written over a faint rectangular stamp or box.

Prepared by compliance department

**SARL LA VRAIE FRANCE
34 AVENUE DES Champs-Élysées
75008 PARIS
FRANCE**