

AML POLICY OF FDHTUYUI.COM

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Introduction: fdhtuyui.com is a brand name of U8 Group B.V., fdhtuyui.com is operated by U8 Group B.V. which has its office registered in Zuikertuintjeweg Z/N (Zuikertuin Tower), Curaçao. References in this policy to "the Company", "We", "Us" or "Our" means U8 Group B.V.

Objective of the AML Policy: We seek to offer the highest security to all of our users and customers on fdhtuyui.com. For that, a five-step account verification is done in order to ensure the identity of our customers. The reason behind this is to prove that the details of the person registered are correct and the deposit methods used are not stolen or being used by someone else, which is to create the general framework for the fight against money laundering. We also take into account that depending on the nationality and origin, the payment method and withdrawal method, different safety measurements must be taken. fdhtuyui.com also puts reasonable measures in place to control and limit ML risk, including dedicating the appropriate means.

fdhtuyui.com is committed to high standards of anti-money laundering (AML) according to EU and other international guidelines, compliance, and requires management and employees to enforce these standards in preventing the use of its services for money laundering purposes.

Definition of money laundering:

The conversion or transfer of property, especially money, knowing that such property is derived from criminal activity or from taking part in such activity, for the purpose of concealing or disguising the illegal origin of the property or of helping any person who is involved in the commission of such an activity to evade the legal consequences of that person's or company's action;

The concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from an act of participation in such an activity;

The acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from assisting in such an activity;

Participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counseling the commission of any of the actions referred to in points before.

Money laundering shall be regarded as such even when the activities which generated the property to be laundered were carried out in the territory of another Member State or in that of a third country.

Organization of the AML for fdhtuyui.com: In accordance with the AML legislation, the board of directors of U8 Group B.V. is responsible for the prevention of money laundering on fdhtuyui.com.

AML policy changes and implementation requirements: Each major change of fdhtuyui.com AML policy is subject to approval by the managing director of U8 Group B.V.

Know Your Customer and Transaction Monitoring

fdhtuyui.com will apply appropriate user due diligence and ongoing monitoring measures required by law. fdhtuyui.com will endeavor to prevent users from engaging in illicit or otherwise unauthorized activity. fdhtuyui.com uses a combination of its software development and other service agreements, which are enforced through internal operational features to ensure that it complies with the applicable law.

Know Your Customer

Customer Due Diligence ("CDD")

fdhtuyui.com has adopted a risk-based CDD to enable fdhtuyui.com to understand the nature and purpose of the user relationship to the fdhtuyui.com platform in order to develop a customer risk profile. In order to do so, fdhtuyui.com collects documentary and non-documentary information at account-opening.

Collecting baseline (e.g., wallet address, email address) information at account creation through fdhtuyui.com's user onboarding portal;

Monitoring the risk profile associated with the underlying cryptocurrency wallet used to fund the user's account;

Maintaining records of the information used to identify the user; and

Determining if a user appears on any list of known or suspected terrorists or terrorist organizations provided to the financial institutions based on the above information.

The above steps are operationalized using the following measures:

Identity and Age Verification. A third-party service provider will support fdhtuyui.com's ability to determine the legitimacy of the identification information other KYC materials or information provided and will confirm that the user is permissible. The service provider also will confirm that the user does not appear to be located in a comprehensively-sanctioned or otherwise prohibited jurisdiction and will search global sanctions lists to confirm that the user does not appear thereon using onboarding information such as wallet addresses.

Customer Information. fdhtuyui.com will collect details on each user to form a reasonable belief that fdhtuyui.com knows the identity of its users commensurate with the user's risk profile. For instance, fdhtuyui.com may collect such details as the wallet address, name, address, country, date of birth, or postal code (collectively, "KYC Information").

Enhanced Due Diligence and Ongoing Monitoring

fdhtuyui.com performs ongoing monitoring on its users in order to detect any behaviors or indicators that might raise suspicions in regard to money laundering and terrorism financing practices. For that purpose, fdhtuyui.com has implemented a set of red flag indicators that help it determine such behaviors and require further action from fdhtuyui.com in assessing the customer information.

Whenever one of those red flags is triggered, the user account will be suspended and fdhtuyui.com will pursue enhanced due diligence. Enhanced KYC diligence under this policy is deemed to include, but not limit to, the provision of:

Full legal name;
Country of citizenship;
Permanent Address (which, for an individual, must be a residential or business street address, and for an entity, must be a principal place of business, local office or other physical location);
Identification number (either a taxpayer identification number, or, if unavailable, a passport number and country of issuance, alien identification card number or number and country of issuance of another government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard);
Identification Document; and
Source of Funds and Source of Wealth.
fdhtuyui.com may use third-party service providers to verify any of the above information as determined to establish a reasonable basis to know the true identity of the user where the user's activity warrants such action.

Acceptance Policy

fdhtuyui.com will not accept and will block the users who:

Do not provide the identification information requested by fdhtuyui.com;
Provide fake identification documents;
Try to use different means to deceive about their location;
Are from restricted or prohibited jurisdictions; or
Are subjected to United States, European Union, or other global sanctions or watch lists;
Are gambling addicts or have mental health issues;
Its source of funds are originated or exchanges in restricted jurisdictions;
fdhtuyui.com reserves the right to block and suspend player for any other reasons at its own description.

Transaction Monitoring

fdhtuyui.com will conduct ongoing monitoring on a regular basis using rule-based systems developed in-house and others from third-party vendors to review user history and patterns of activity to detect and report any unusual activity as required and to develop and implement any additional controls or limits in its platform.

fdhtuyui.com has implemented procedures addressing the following two key components of unusual or suspicious activity:

Identification of unusual activity through methods of identification may include employee and customer identification, law enforcement inquiries, other referrals, or transaction and surveillance monitoring system reports; and
Alert management that focuses on processes used to investigate, evaluate and document identified unusual or potentially suspicious activity.
fdhtuyui.com will use the following processes to achieve both goals:

Transaction Monitoring for Sanctioned or Prohibited Jurisdictions. fdhtuyui.com may in its reasonable discretion impose certain due diligence requests at user balance withdrawal. fdhtuyui.com presently conducts a mixture of manual and automated transaction monitoring

processes to identify “red flag” behavior. Where such red flag behavior is identified, fdhtuyui.com may refuse to process any withdrawal attempts or collect additional information from the recipient. fdhtuyui.com will further endeavor to limit any attempted user account funding from prohibited jurisdictions (which are identified in the fdhtuyui.com user-facing disclosures and updated from time to time internally) where the associated wallet address indicates that the user or the user’s funds are located in such a prohibited jurisdiction. For instance, fdhtuyui.com may prohibit a user from funding their fdhtuyui.com account using a known U.S. based exchange wallet as such assets indicate that the user is a U.S. person. Users will have the ability to rebut any suspension with additional information as part of fdhtuyui.com’s ongoing transaction monitoring and user due diligence standards.

Screening for Sanctioned Parties. Prior to issuing a fdhtuyui.com funding address to a user, fdhtuyui.com will screen a user’s wallet address against applicable sanctions databases. Such screening measures will rely on third-party blockchain forensics vendors such as Chainalysis. fdhtuyui.com will periodically re-screen wallet addresses against such databases.

Identification of Unusual Activity. fdhtuyui.com will monitor account activity for unusual size, volume, pattern, or type of transactions, taking into account risk factors and red flags that are appropriate to its business. Monitoring will be conducted running regular reports of unusual, high risk, or suspicious user activity.

Anti-Mixing Measures. fdhtuyui.com will utilize software designed to detect other suspicious deposit or withdrawal patterns. Such instances will be dealt with on a case-by-case basis, depending on the perceived level of risk. In such instances, a user may be required to explain their methodology and purpose for using the platform.

Chainalysis Review. Every single crypto deposit or withdrawal both indirect and direct will run through Chainalysis and be reviewed for signs of fraud or suspicious behavior. A user’s account will be suspended and reviewed upon alert of potential illicit behavior. Sufficient proof of wealth may be requested from high-risk accounts. fdhtuyui.com may refuse to withdraw to certain “high-risk” addresses as determined in consultation with Chainalysis risk scoring.

Withdrawal Threshold KYC. Additionally, and independently, every account, wherever or with whomever associated, will be suspended until adequate KYC diligence occurs once that account reaches a withdrawal threshold dependent on the account’s risk characterization over the life of the account.

Education and Training

fdhtuyui.com may provide employees AML, anti-terrorist financing and trade sanctions compliance training on a periodic basis, as deemed appropriate.

Reporting

fdhtuyui.com is obliged to report any unusual or suspicious transactions, in accordance with the National Ordinance. Customers that are identified as being on a sanctions list, linked to money laundering or terrorism financing or other criminal activities will be reported as suspicious activity to the regulator.