



ANTI-FRAUD POLICY

Bit Trade Markets Limited (registration number 2499449) registered at the address 19H Maxgrand Plaza, No.3 Tai Yau Street, San Po Kong, Kowloon, Hong Kong (hereinafter referred to as the “Company”), presents its Anti-Fraud Policy (hereinafter referred to as the “Policy”) intended for preventing and reducing any possible risks for the Company related to its involvement in fraudulent activities of any kind.

According to both international and national standards, the Company is required to implement efficient internal procedures and mechanisms for preventing fraudulent activities, as well as to respond promptly in the event of any suspicious actions of the Website User.

The Company pursues a “zero tolerance” policy towards fraud, corruption, collusion, money laundering, terrorist financing and other criminal conduct, and will thoroughly investigate and take disciplinary and/or legal action against those who are involved in or assist with fraudulent or other improper actions while using the Bit Trade website.

The Company takes all necessary actions to implement this Policy.

The Policy is available on the Bit Trade website www.bit.trade (hereinafter referred to as the “Website”).

TABLE OF CONTENTS

1. TERMS AND DEFINITIONS	2
2. GENERAL PROVISIONS.....	2
3. LEGISLATION COMPLIANCE	3
4. ACTIONS OF THE COMPANY	3
5. FRAUD DETECTION.....	4
6. GENERAL TERMS AND CONDITIONS	5



1. TERMS AND DEFINITIONS

1.1. The terms used herein shall be interpreted in accordance with the definitions below:

1.1.1. Fraud is any act or omission, including a misrepresentation that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.

1.1.2. Corruption is offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the action of another party.

1.1.3. Collusion is an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.

1.1.4. Money Laundering is the conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his 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 activity; the acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such activity; participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions mentioned in the foregoing points.

1.1.5. Terrorist Financing is provision or collection of funds, by any means, directly or indirectly, with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out any of the offences considered terrorist financing according to Directive (EU) 2017/541.

1.1.6. Criminal Conduct is conduct, which constitutes an offence in any part of the world or would constitute an offence in any part of the world if it occurred there.

2. GENERAL PROVISIONS

2.1. This Policy shall be applicable to legal relations that arise when you use the functionality of the [Website](#).



2.2. The Company shall not control and shall not be liable for actions of the Website User, which contradict this Policy. Your acceptance of the Anti-Fraud Policy on a third-party resource shall not constitute acceptance of this Policy and vice versa.

2.3. Additions and/or changes may be made to this Policy by publishing the updated version on the Website. Additions and/or changes shall be deemed accepted by you when you use the functionality of the [Website](#) for the first time after the publication of the updated Policy. If you do not accept any update, the only and exceptional means of protection against unauthorized processing of personal data is to stop using the functionality of the [Website](#).

3. LEGISLATION COMPLIANCE

3.1. The Anti-Fraud Policy has been drafted to comply with the current applicable local and international legislation.

3.2. Adherence to the Anti-Fraud Policy will ensure compliance with all relevant legislation and internal policies.

4. ACTIONS OF THE COMPANY

4.1. The Company performs Know Your Customer Policy (KYC) due diligence on all new Website Users and a due diligence on all actions made using the functionality of the [Website](#) in order to detect possible compliance or integrity concern. Such due diligence is performed in accordance with the requirements of the money laundering and terrorist financing activities regulations, pursuant to the terms of KYC.

4.2. In view of the Anti-Fraud Policy the Company is responsible for:

- ensuring efficient and regular actions, procedures and internal controls to prevent and detect the criminal conduct;
- ensuring the Anti-Fraud Commissioner has a capability to identify the misconduct risks in existing systems, procedures and rules;
- ensuring members of the Operational Anti-Fraud Department have a capability to report any internal or external suspicions or incidents of the criminal conduct;
- reviewing continuously its systems, procedures and internal controls through risk management processes and audit mechanisms;
- reporting any suspicions regarding the criminal conduct to the relevant state authorities.



5. FRAUD DETECTION

5.1. Anti-Fraud Commissioners are the first line of detection, investigation and protection in preventing the criminal conduct of the Website Users and evaluating transactions. The Anti-Fraud Commissioner will be responsible for the proper fulfillment of the Anti-Fraud Policy.

5.2. The Anti-Fraud Commissioner working in close collaboration with the Compliance Officers shall be responsible for:

- receiving reports of alleged or suspected criminal conduct involving the Company, the Website Users and/or related actions;
- investigating such matters and cooperating directly with the Nominated Officer in order to facilitate the investigations;
- reporting its findings to the Company management and relevant authorities, as well as any other third party on a need-to-know basis.

5.3. For situations requiring an urgent response, the Anti-Fraud Commissioner may take any necessary measures required for the investigation, notably to preserve evidence.

5.4. The Operational Anti-Fraud Department shall enjoy complete independence in the exercise of its responsibilities. The Anti-Fraud Commissioner shall have full authority to open, pursue, close and report on any investigation on the criminal conduct within its remit without prior notice to, the consent of, or interference from any other person or entity.

5.5. All criminal conduct investigations conducted by the Operational Anti-Fraud Department shall be fair and impartial, with due regard to the rights of the Website Users and persons or entities involved. The presumption of innocence applies to those alleged to have engaged in misconduct. Those involved in the criminal conduct investigation (be those under investigation or those conducting the investigation) should be aware of their rights and obligations and ensure they are fully respected.

5.6. All Website Users are required to cooperate with the Operational Anti-Fraud Department and the Anti-Fraud Commissioner promptly, efficiently and in the manner specified by the Operational Anti-Fraud Department, including by answering relevant questions and complying with requests for information and records.

5.7. In accordance with the Company's internal rules on access to information, all information and documents collected and generated during a criminal conduct investigation, not already in the public domain, shall be kept strictly confidential. The



confidentiality of the information collected will be respected both in the interests of those concerned and the integrity of the investigation.

5.8. In particular, during the criminal conduct investigation the confidentiality will be respected in so far as it would not be contrary to the interests of the investigation.

6. GENERAL TERMS AND CONDITIONS

6.1. In the case of the arising questions regarding this Policy, one should contact the Support Service on the [Website](#).

6.2. Changes and additions to this Policy may be made solely by the Company.

6.3. In case of any discrepancies between different versions of this Policy (printed, electronic, etc.), the electronic version of this Policy currently available on the [Website](#) shall be deemed the official one.

6.4. The translation of this Policy into other languages is available on the [Website](#) for convenience only. In case of any differences in interpretation hereof, the version in Russian shall prevail.