AML / CTF Policy for Website (Public Version)

Mexmio LLC
Updated: 2025

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1. Introduction

Mexmio LLC ("Company", "we", "our") operates a non-custodial crypto-to-fiat and fiat-to-crypto exchange service.
We are committed to preventing **money laundering**, **terrorist financing**, and **any illegal financial activity** on our platform.

This AML / CTF Policy explains:

- how we identify and verify customers,
- how we monitor transactions,
- which activities are prohibited,
- how we comply with the legislation of Georgia and FATF standards.

By using our website **https://mexm.io**, you agree to comply with this Policy.

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2. Legal Basis

Our AML/CTF framework is based on:

- The Law of Georgia on Facilitating the Suppression of Money Laundering and Terrorism Financing;
- Regulations and guidelines of the Financial Monitoring Service of Georgia (FMS);
- FATF Recommendations;
- Internal AML, KYC, and Compliance Procedures of Mexmio LLC.

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3. Customer Verification (KYC)

Before accessing any exchange operations, each user must pass **identity verification (KYC)**.

Verification is processed through a licensed third-party provider (AMLBot by Safe3 UAB, Lithuania).

We verify:

- Identity document authenticity

- Facial match & liveness check
- Sanctions & PEP lists
- IP/geolocation risk indicators

Verification levels:

Basic KYC – for transactions up to **1,000 GEL**
Enhanced KYC (EDD) – for transactions above **1,000 GEL**, may require:

- proof of address
- source of funds documentation

We reserve the right to decline or suspend service if verification is not completed or appears suspicious.

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4. Prohibited Users

We do **not** provide services to:

- Citizens or residents of sanctioned jurisdictions (Russia, Belarus, Iran, Syria, DPRK, etc.);
- Individuals on FATF black/grey lists;
- Politically Exposed Persons (PEPs) or their close associates;
- Individuals providing false, inconsistent, or unverifiable information.

Attempts to circumvent these restrictions may result in a permanent ban.

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5. Source of Funds (SOF)

For transactions above **1,000 GEL**, we may request documents confirming the legality of funds, including:

- salary or business income,
- investment income,
- sale of assets,
- inheritance or gifts (with supporting documentation).

If the source cannot be verified, the operation will be declined.

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6. Transaction Monitoring

We continuously monitor all transactions to detect suspicious activity.

Indicators include:

- unusual transaction patterns,
- frequent exchanges inconsistent with profile,
- involvement of high-risk jurisdictions,
- attempts to evade verification.

Suspicious operations may be delayed, cancelled, or reported to the FMS in accordance with the law.

We are prohibited by law from informing clients about STR (Suspicious Transaction Reports).

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7. Record Keeping

In compliance with Georgian AML law, we store:

- KYC data,
- transaction records,
- monitoring logs
  for **a minimum of 5 years** after the relationship ends.

All data is securely stored on **AWS Ireland**, encrypted and protected by MFA and restricted access.

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8. Data Protection

We follow strict technical and organizational measures to ensure data security, including:

- AES-256 encryption,
- TLS 1.3,
- secure storage within the EU (GDPR compliant),
- no custodial storage of client funds.

Details are outlined in our internal IT Security Policy.

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9. Suspicious Activity Reporting

If we identify a suspicious transaction or attempted misuse of our service, we may:

- freeze or cancel the transaction,
- request additional documents,
- restrict or close the account,
- file a report with the FMS.

We comply with all legal reporting obligations.

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10. User Responsibilities

By using mexm.io, you agree:

- to provide true and accurate information,
- not to engage in unlawful activities (fraud, scams, cybercrime, money laundering),
- not to use VPNs, anonymizers, or third-party accounts to misrepresent your identity.

Any violation may lead to service termination.

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11. Changes to the Policy

Mexmio LLC may update this AML/CTF Policy to reflect changes in legislation or business processes.
The most recent version is always available on our website.

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12. Contact Information

For compliance-related inquiries:
compliance@mexm.io
Mexmio LLC
Tbilisi, Georgia