***AML & KYC POLICY***
***QQ DIGITAL ONE***

**Version:** 1.0

**Effective Date:** April 16, 2026

## 1. STATEMENT OF COMMITMENT

**QQ Digital One** ("the Company") is committed to the highest standards of **Anti-Money Laundering (AML)** and **Counter-Terrorist Financing (CTF)**. Our policy is to prevent the use of our neo-banking and tokenization services by criminals to launder money or finance illegal activities. We operate under a zero-tolerance policy regarding financial crime and regulatory non-compliance.

## 2. REGULATORY FRAMEWORK

Our AML program is built to comply with international standards, including:

The **Financial Action Task Force (FATF)** recommendations.

**The Bank Secrecy Act (BSA)** and the **USA PATRIOT Act**.

Local regulations in jurisdictions where QQ Digital One operates.

The **"Travel Rule"** for virtual asset service providers (VASPs).

## 3. CUSTOMER DUE DILIGENCE (KYC/CDD)

No user may access our financial services, including card issuance or asset tokenization, without completing our mandatory identity verification process.

**Identification:** Individual users must provide a valid government-issued ID (Passport, National ID). Corporate entities must provide Articles of Incorporation and proof of legal existence.

**Ultimate Beneficial Ownership (UBO):** For corporate accounts, we identify and verify all natural persons who own or control **25% or more** of the entity.

**Enhanced Due Diligence (EDD):** High-risk clients, including **Politically Exposed Persons (PEPs)** or those from high-risk jurisdictions, are subject to intensified monitoring and must provide **Source of Wealth (SOW)** and **Source of Funds (SOF)** documentation.

## 4. TRANSACTION MONITORING

QQ Digital One employs automated and manual systems to monitor transactions in real-time. We specifically look for:

**Structuring:** Multiple transactions just below reporting thresholds.

**Rapid Movement:** Immediate withdrawal of funds after a deposit with no apparent economic purpose.

**Third-Party Payments:** Discrepancies between the account holder and the sender/receiver of funds.

**Unusual Patterns:** Activity that is inconsistent with the client's declared business profile or historical behavior.

## 5. SANCTIONS SCREENING

The Company performs daily automated screening of all users against global sanctions lists, including but not limited to:

**OFAC** (Office of Foreign Assets Control - USA).

**UN Security Council** Consolidated List.

**EU** Financial Sanctions List.

Intervention lists from relevant local regulators.

**Prohibited Jurisdictions:** We do not onboard users from North Korea, Iran, Syria, or other regions subject to comprehensive international embargoes.

## 6. SUSPICIOUS ACTIVITY REPORTING (SAR)

Where there is any suspicion that funds are the proceeds of criminal activity or are intended for terrorism, QQ Digital One will:

Internally escalate the case to the **Money Laundering Reporting Officer (MLRO)**.

Freeze the assets and/or suspend the account.

File a **Suspicious Activity Report (SAR)** or **Suspicious Transaction Report (STR)** with the appropriate Financial Intelligence Unit (FIU) as required by law, without "tipping off" the user.

## 7. RECORD KEEPING

In accordance with international banking standards, QQ Digital One maintains records of all identity documentation and transaction data for a minimum of **five (5) years** after the termination of the business relationship or the execution of a transaction.

### 8. TRAINING AND AUDIT

All employees involved in financial operations undergo mandatory annual AML/CTF training.

Our AML program is subject to periodic independent audits to ensure effectiveness and compliance with evolving digital asset regulations.

### 9. CONTACT

For inquiries regarding our compliance framework, please contact our Compliance Department at:

**Email:** compliance@qqdigitalone.com

**QQ Digital One Legal Department**

**Internal Compliance Note:**

> *As your analyst, I must emphasize that having this policy on your website is only the first step. For your* ***QQ Digital One*** *operation—especially involving* ***RWA Tokenization****—it is critical that your backend systems (like your Hyperledger Fabric network) are integrated with an AML provider (e.g., Chainalysis, Elliptic, or TRM Labs) to monitor "on-chain" transactions and ensure you are not interacting with "tainted" crypto wallets.*