



## **Black Diamond Holding Group Anti-Money Laundering and Combating the Financing of Terrorism Policy**

### **DESCRIPTION**

Black Diamond Holding Group is committed to adopting a global policy to combat money laundering and the financing of terrorism.

This policy contains the main anti-money laundering and combating the financing of terrorism ("AML-CFT") rules applicable to Black Diamond Holding Group's activities and complies with the principles of the relevant European legislation as amended and supplemented from time to time (Directive (EU) 2018/843 of the European Parliament and of the Council of May 30, 2018 amending Directive (EU) 2015/849 on the prevention of the use of the financial system for the purpose of money laundering or terrorist financing and Directives 2009/138/EC and 2013/36/EU), best banking practices and current market standards.

Personal data submitted to Black Diamond Holding Group under its AML/CFT policy and related implementation procedures are processed in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 ("Data Protection Regulation") on the protection of individuals with regard to the processing of personal data by the institutions, bodies, offices and agencies of the Union and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC. Detailed provisions on the application of the Data Protection Regulation for AML/CFT purposes can be found in the relevant privacy statements published by the EIB and the EIF on their respective websites (EIB: <https://www.eib.org/fr/privacy/aml-cft>, EIF: [https://www.eif.org/attachments/eif\\_data\\_protection\\_statement\\_financial\\_in\\_intermediaries\\_due\\_diligence\\_en.pdf](https://www.eif.org/attachments/eif_data_protection_statement_financial_in_intermediaries_due_diligence_en.pdf)).

Black Diamond Holding Group's AML/CFT policy aims to prevent the involvement or use of the institution, its governing bodies, staff and counterparties for money laundering, terrorist financing or other criminal activities.

**Main measures:**

- 1) risk assessment
- 2) identification and verification of the identity of customers and their beneficial owners
- 3) Vigilance measures at entry and throughout the business relationship
- 4) Harmonization of enhanced due diligence measures for business relationships or transactions involving high-risk third countries
- 5) Bringing certain digital asset service providers within the scope of LCB-FT rules

Our financial institution Revolut, where Black Diamond Holding has its bank account, works closely with the British authorities, the National Crime Agency (NCA) and the Financial Conduct Authority (FCA), and immediately notifies them of any high-risk cases.

Our exclusive digital cash provider Xmoney (blockchain MultiversX formerly Elrond), the world leader in digital cash, complements Black Diamond Holding Group's procedures with powerful anti-money laundering (AML) processes that verify the identity of each sender and recipient to ensure there is no illegal activity behind their activity, including money laundering or the financing of terrorism, applies LCB/FT regulations, Customer Due Diligence (CDD) and Suspicious Activity Reports (SAR).

