



# BANK SERVICES

for the exchange of digital assets



# IN BRIEF

The information contained within this brochure is for internal and official use only and is not for distribution.

This document attempts to set out the primary processes for the exchange of digital asset to FIAT, FIAT to digital asset and digital asset to digital asset.

The Initiam Asset Exchange Service is only available through personal introduction and through affiliated introducers who are known and registered with Initiam Capital Group.

# INTRODUCTION

## ESTABLISHED

The Initial Asset Exchange Service uses its established links with an FCA Regulated, U.K based partner providing a professional exchange service through its established networks of financial intermediaries ensuring the highest level of flexibility and execution.

## BANKING THE ASSET

Our platform partner will safeguard your asset and retain it within their secure wallets and exchange into one of many denominations whether FIAT or digital currency upon request.

## EXCHANGE

Our platform partner will provide you with a secure process via their portal using the world's largest liquidity providers for both digital and FIAT exchanging and execution of your asset,





## Primary

- BTC | USDT | ETH
- GBP/EUR Currencies
- Global Liquidity Provision



## Security

- U.K FCA Regulated Partner
- Wallet Security
- Discreet Exchange



## Who can use the service?

- Family Trusts
- HNW Individuals
- Beneficial Owners

# KEY PROCESSES

## THE EXCHANGE

- Discussion with interested party
- Onboarded directly to platform or via IC Contract
- AML report carried out on wallet
- Transfer to either the platform or the IC cold wallet
- Exchange
- Repatriate FIAT/digital currency to client designated account

## DIGITAL TO FIAT

Stage 1 - After discussion and initial internal review, Initiam Capital to provide Client with eligibility report on their wallet

**Time: circa. 24 hours.**

Stage 2 – Set up terms either directly to the platform or IC contract

**Time: circa. 48 hours.**

Stage 3 - After review, DD of digital asset, and asset report provided to Client, Client transfers asset to the platform or the IC cold wallet

**Time: 24 hours (Client dependent)**

The processes have been designed to minimise the whole exchange timescale and to make the whole process smooth and efficient, whatever the jurisdiction or digital asset being exchanged\*

\*Only BTC, ETH or USDT can be exchanged for FIAT currently

# FIAT TO DIGITAL

Stage 1 - After submission of the initial KYC checks along with proof of fund ownership, Initiam Capital to provide Client with eligibility report.

**Time: circa. 48 hours.**

Stage 2 – IC confirm appetite and willingness to exchange in writing

**Time: circa. 24 hours.**

Stage 3 - After review and DD of UBO, IC sends link to set up directly with the platform.

**Time: 24 hours. (Client dependent)**

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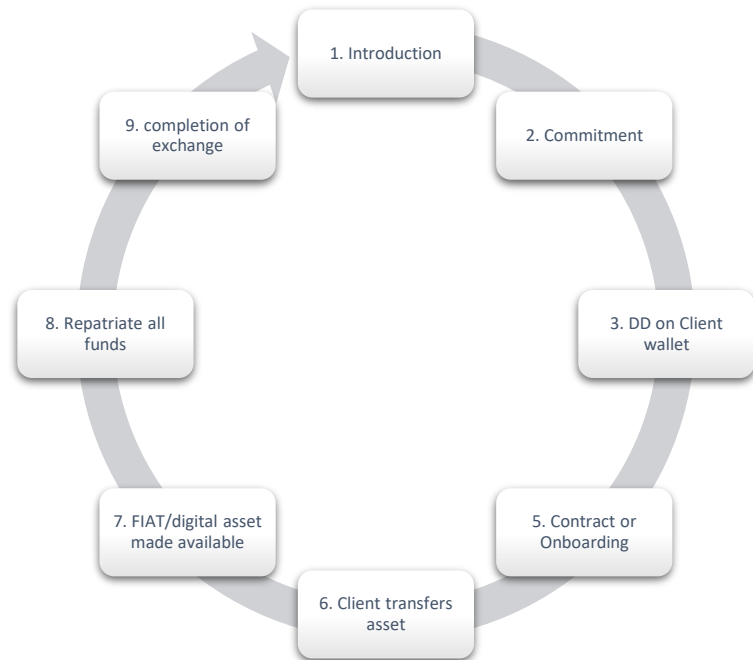
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# DIAGRAMS

Process:



Ensuring  
transparency  
and security  
| simplicity  
and ease



# SUMMARY

The Initiam Partners Banking Service has been carefully tailored to match the requirements of our most private and discreet clientele ensuring that whatever digital asset they wish to exchange, they have access to a professional, secure, and unique service provider that handles the entire operation to repatriate their funds safely and securely.

Get in touch with us to find out more as to how the Initiam Group can assist you or your clients to exchange their digital assets and to find out more about how to invest into the bespoke Initiam Private Fund offerings through their centralised offshore operation in Gibraltar, Luxembourg, and Switzerland.



# AML/KYC POLICY

## Introduction

The INITIAM CAPITAL Anti-Money Laundering and Know Your Customer Policy (hereinafter - the "AML/KYC Policy") is designated to prevent and mitigate possible risks of INITIAM CAPITAL being involved in any kind of illegal activity.

Both international and local regulations require INITIAM CAPITAL to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption, and bribery and to act in case of any form of suspicious activity from its Users.

- AML/KYC Policy covers the following matters:
- Verification procedures.
- Sanctions and PEP lists screening.
- Compliance Officer.
- Monitoring Transactions.
- Risk Assessment.

## 1. Verification procedures

One of the international standards for preventing illegal activity is customer due diligence ("CDD"). According to CDD, INITIAM CAPITAL establishes its own verification procedures within the standards of anti-money laundering and "Know Your Customer" frameworks.

### 1.1. Identity verification

INITIAM CAPITAL's identity verification procedure requires the User to provide INITIAM CAPITAL with reliable, independent source documents, data, or information (e.g., national ID, international passport, bank statement, utility bill). For such purposes INITIAM CAPITAL reserves the right to collect User's identification information for the AML/KYC Policy purposes.

INITIAM CAPITAL will take steps to confirm the authenticity of documents and information provided by the Users. All legal methods for double-checking identification information will be used and INITIAM CAPITAL reserves the right to investigate certain Users who have been determined to be risky or suspicious. INITIAM CAPITAL reserves the right to verify User's identity in an on-going basis, especially when their identification information has been changed or their activity seemed to be suspicious (unusual for the User). In addition, INITIAM CAPITAL reserves the right to request up-to-date documents from the Users, even though they have passed identity verification in the past.

Once the User's identity has been verified, INITIAM CAPITAL is able to remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity.

## 2. Sanctions and PEP lists screening.

INITIAM CAPITAL screens applicants against recognised Sanctions and Politically Exposed Persons (PEPs) lists. Individuals and legal entities are screened against mentioned lists:

on the onboarding stage when the user is submitting the application;  
on each anti-fraud and AML alerts manually by Compliance Officer;  
monthly by running automatically with a script to re-check all DB of customers.

## 3. Compliance Officer

The Compliance Officer is the person, duly authorized by INITIAM CAPITAL, whose duty is to ensure the effective implementation and enforcement of the AML/KYC Policy. It is the Compliance Officer's responsibility to supervise all aspects of INITIAM CAPITAL's anti-money laundering and counter-terrorist financing, including but not limited to:

a. Collecting Users' identification information. b. Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations. c. Monitoring transactions and investigating any significant deviations from normal activity. d. Implementing a records management system for appropriate storage and retrieval of documents, files, forms, and logs. e. Updating risk assessment regularly. f. Providing law enforcement with information as required under the applicable laws and regulations.

The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

## 4. Monitoring Transactions

The Users are known not only by verifying their identity (who they are) but, more importantly, by analysing their transactional patterns (what they do). Therefore, INITIAM CAPITAL relies on data analysis as a risk-assessment and suspicion detection tool. INITIAM CAPITAL performs a variety of compliance-related tasks, including capturing data, filtering, record-keeping, investigation management, and reporting. System functionalities include:

1) Daily check of Users against recognized "blacklists" (e.g., OFAC), aggregating transfers by multiple data points, placing Users on watch and service denial lists, opening cases for investigation where needed, sending internal communications and filling out statutory reports, if applicable;  
2) Case and document management.

With regard to the AML/KYC Policy, INITIAM CAPITAL will monitor all transactions and it reserves the right to:

ensure that transactions of suspicious nature are reported to the proper law enforcement through the Compliance Officer;  
request the User to provide any additional information and documents in case of suspicious transactions;  
suspend or terminate User's Account when INITIAM CAPITAL has reasonable suspicion that such User engaged in illegal activity.

The above list is not exhaustive, and the Compliance Officer will monitor Users' transactions on a day-to-day basis to define whether such transactions are to be reported and treated as suspicious or are to be treated as *bona fide*.

## 5. Risk Assessment

INITIAM CAPITAL, in line with the international requirements, has adopted a risk-based approach to combating money laundering and terrorist financing. By adopting a risk-based approach, INITIAM CAPITAL can ensure that measures to prevent or mitigate money laundering and terrorist financing are commensurate to the identified risks. This will allow resources to be allocated in the most efficient ways. The principle is that resources should be directed in accordance with priorities so that the greatest risks receive the highest attention.