



October 2, 2018
bitFlyer, Inc.

Announcing the Formulation of New Fundamental Policies

We at bitFlyer, Inc. (“bitFlyer”; Headquarters: Minato-ku, Tokyo; Representative Director: Nobuyoshi Suzuki) would like to announce that we have formulated an *Anti-Money Laundering and Countering the Financing of Terrorism Policy* as well as revised our *Fundamental Policy on Eliminating Relationships with Anti-Social Forces*.

We are strengthening our “Anti-money laundering and combating the financing of terrorism (“AML/CFT”) risk management readiness” and “eliminating anti-social forces risk management readiness” initiatives.

Anti-Money Laundering and Countering the Financing of Terrorism Policy

bitFlyer, Inc. (“bitFlyer”) sets this policy to comply with applicable laws and regulations and ensure that appropriate practices are exercised.

1. Top Priorities of Business Management

bitFlyer acknowledges the implementation of AML/CFT measures as a critical issue, and establishes and operates the compliance structure to enforce the measures in a timely and appropriate manner.

2. Money Laundering Reporting Officer

One of bitFlyer, Inc.’s directors or executive officers is appointed as the Anti-Money Laundering Officer to systematically and accurately implement AML/CFT measures under their direction.

3. Customer Management Policy

We shall collect and properly evaluate the information of customers, and take appropriate countermeasures commensurate with the risk level of the customer. The countermeasures are updated based on the results of timely investigation and analysis on customer transaction records.

4. Economic Sanctions and Asset Freezing

All transactions are screened against various sanction lists and any transactions found to involve specially designated individuals/entities are blocked. We shall implement the appropriate measures to freeze the accounts of designated individuals/entities in which a targeted government or authority has an interest. Furthermore, based on applicable laws

and regulations, we shall take the appropriate countermeasures including the refusal of transaction requests and dissolution of business relationships.

5. Reporting of Suspicious Transactions

We shall perform transaction monitoring periodically and as necessary to ensure that suspicious transactions or activities detected by monitoring and screening systems are promptly reported to the appropriate authorities.

6. Internal Training

We shall provide training periodically and as necessary in order to enhance every officer and employee's knowledge and foster their awareness of applicable laws and regulations, and our policy and procedures regarding AML/CFT measures.

7. Monitoring and Testing

We aim to maintain and strengthen our AML/CFT measures through routine and comprehensive assessments conducted by our internal auditing division on the overall compliance to our AML/CFT measures.

Fundamental Policy on Eliminating Relationships with Anti-Social Forces

bitFlyer, Inc. ("bitFlyer") has enacted this fundamental policy to prevent damages by groups or individuals who seek to employ violent, influential, or fraudulent methods in order to gain economic benefits ("anti-social forces").

1. Complete Disassociation

bitFlyer shall maintain absolutely no relationships with anti-social forces. Should any group or individual we are performing transactions with be discovered to be an anti-social force, we shall promptly cease any and all transactions with them.

2. Response as an Organization

bitFlyer shall respond as an entire organization to prevent damages by anti-social forces.

3. Cooperation with External Organizations

In order to maintain a disassociation with anti-social forces, bitFlyer shall establish and maintain close relationships and cooperate with external agencies such as the police, the organized crime elimination center, and lawyers.

4. Rejecting Unreasonable Demands

bitFlyer shall absolutely not respond to unreasonable demands from anti-social forces. Any unreasonable demands from anti-social forces shall be rejected.

5. Prohibition on the Provision of Funding

bitFlyer prohibits the provision of funds or illegal profits to anti-social forces.

6. Safeguarding Employees

bitFlyer shall ensure the safety of our employees from anti-social forces.

Media Inquiries

PR team, bitFlyer, Inc.

Midtown Tower, 9-7-1 Akasaka, Minato-ku, Tokyo 107-6208

HP : <https://bitflyer.com> Contact : <https://bitflyer.com/Contact>