

# Anti-Money Laundering (AML) Policy

**Eldorado Digi World Service – Effective: May 2025**

## 1. Introduction

This policy outlines the measures taken by **Eldorado Digi World Service** (“Eldorado”) to prevent money laundering, terrorist financing, and other financial crimes. Eldorado is committed to the principles of integrity, transparency, and regulatory compliance.

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## 2. Legal Basis

This AML Policy is based on:

- The **Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT)** regulations of the **United Arab Emirates (UAE)**
  - The recommendations of the **Financial Action Task Force (FATF)**
  - Relevant international standards and best practices for virtual assets
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## 3. Scope

This policy applies to:

- All services offered by Eldorado (including token sales, wallet use, staking, and NFT-based retirement plans)
  - All natural and legal persons in business relationships with Eldorado
  - All employees, partners, service providers, and consultants of Eldorado
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## 4. Customer Identification (KYC – Know Your Customer)

Eldorado conducts full identity verification for all users, which includes:

- Collecting full name, date of birth, nationality, and address
- Submitting a valid identity document
- Performing a video verification (“liveness check”) if required
- Recording the user’s wallet address(es)

The verification process is carried out and logged by qualified third-party providers (e.g. Sumsub).

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## 5. Risk-Based Approach

Each new business relationship is assessed and categorized into risk classes:

- **Low Risk:** Verified individuals from regulated jurisdictions
- **Medium Risk:** Users with complex structures or from non-FATF member countries
- **High Risk:** Politically exposed persons (PEPs), users from high-risk countries

Transactions exceeding certain thresholds are subject to enhanced due diligence.

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## 6. Suspicious Activity Reporting and Transaction Monitoring

Eldorado uses automated transaction monitoring tools. Suspicious activities include but are not limited to:

- Unusually large token purchases with no clear origin
- Use of multiple wallets within a short time
- Transactions with known high-risk addresses
- Obfuscation through mixing services

In the event of suspicious activity, an internal review is conducted and, if necessary, a report is submitted to the relevant UAE authorities.

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## 7. Prohibited Countries and Activities

Users from certain countries are excluded from using the platform (e.g., as per UAE sanctions lists or the FATF blacklist). The following are also strictly prohibited:

- Using the platform to finance illegal activities
  - Use of Eldorado services by sanctioned organizations or individuals
  - Circumvention of KYC procedures (e.g., through VPNs or false information)
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## 8. Training and Internal Controls

All team members with access to customer data or transaction information receive regular training on:

- Money laundering detection

- Risk assessment
- Reporting obligations and due diligence

This AML Policy is reviewed at least once per year and updated to reflect new regulatory requirements.

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## **9. Cooperation with Authorities**

Eldorado actively cooperates with UAE regulatory authorities and fulfills official requests including:

- Disclosure of relevant data
  - Transaction analyses
  - Support in investigations
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## **10. Recordkeeping**

KYC records, transaction data, and internal audit logs are stored for a minimum of **five (5) years**, even after the termination of a business relationship.