



Public AML Statement

VERSION 1.0 · EFFECTIVE FROM 1 SEPTEMBER 2026 · LAST REVIEWED 22 JULY 2026

1. Our commitment. CashXChain is committed to preventing money laundering and terrorist financing. CashXChain UG (haftungsbeschränkt) is not an obliged entity (Verpflichteter) within the meaning of § 2 [GwG](#) ⁷; it therefore has no direct reporting obligation under § 43 GwG and no freezing obligation under § 46 GwG. The regulated steps in our service, and the anti-money-laundering obligations that attach to them — including customer due diligence, monitoring, suspicious-activity reporting and any freezing — are carried out by our licensed Partner institutions within their own regulatory perimeter. CashXChain operates the technology and orchestration layer, applies high standards, supports the Partners' controls, and cooperates fully with the Partners and the authorities. We retain, and exercise at our discretion, (i) broad contractual platform-access controls and (ii) voluntary reporting rights.

2. Standards we follow. As a matter of best practice, our internal anti-money-laundering programme is designed to standards drawn from German, European Union, United States, United Kingdom and Canadian law and the recommendations of the Financial Action Task Force (FATF).

3. Who is responsible. Although we are not statutorily required to appoint one, we have designated a Money Laundering Reporting Officer (MLRO) as a matter of best practice. The MLRO is Dr. Martin Israel, Managing Director, reachable through the contact below. A Deputy MLRO will be designated if and when we become an obliged entity or as the company grows.

4. Knowing our customers. Before a business relationship begins, we and our Partner verify the business and the people who own and control it. We do not transact with a business we cannot verify.

5. Sanctions. We screen customers, their owners and their counterparties against applicable sanctions lists and we refuse to deal where there is a confirmed match. Our full position is in our [Public Sanctions Statement](#).

6. Monitoring and reporting. Our licensed Partners monitor transactions for signs of financial crime and make the reports required of them as obliged entities, including to the German Financial Intelligence Unit. Although CashXChain is not itself a Verpflichteter, we reserve the right to make voluntary reports to competent authorities — including criminal complaints under § 158 StPO and voluntary suspicious-activity reports under § 261 (8) StGB — where we identify indicators of money laundering, terrorism financing, sanctions evasion, fraud, or other serious criminal activity. We do so in good faith and independently of any regulatory obligation. Where the law prevents us from telling a customer that a report has been made, we will not do so.

7. Information that travels with transfers. Details of the sender and the recipient accompany every transfer, as the law requires. Transfers are made only between accounts held at regulated providers, not to or from self-hosted wallets. This is explained further in our [Travel Rule Notice](#).

8. Records and training. The five-year retention of anti-money-laundering records that applies to the regulated steps is met by our licensed Partners as the obliged entities. We keep our own business and accounting records for the periods the law requires, together with records of any voluntary reports we make. Our staff receive anti-money-laundering training and our controls are reviewed regularly.

9. Contact. You can reach our compliance function at compliance@cashxchain.com.