

Anti-Money Laundering and Counter-Terrorist Financing Policy of PAYAPP DIGITAL, UAB

PAYAPP DIGITAL, UAB (hereinafter referred to as "PAYAPP") is committed to combat money laundering and terrorist financing and ensure that products and services products enlisted at the PAYAPP, which are provided on behalf of Globalnetint, UAB are not misused for the purpose of money laundering, terrorism financing and other fraud events. It is also prohibited to provide any product or service or proceed any transaction for the benefit of individual or entity included in the international sanctions lists. As such, the adherence with applicable laws and regulations in relation to prevention of money laundering and terrorist financing (hereinafter referred to as "AML") is mandatory and fundamental to PAYAPP's strategy and program.

PAYAPP has strict and transparent standards and continuously strengthens PAYAPP's processes so as to ensure compliance with applicable AML laws and regulations.

PAYAPP reserves the right to reject any customer, payment or business that is not consistent with the PAYAPP AML policy subject to the requirements of the applicable AML laws and regulations.

Adherence to Applicable AML Laws and Regulations

In accordance with AML regulations, the customer is required to provide PAYAPP an accurate and complete information and documentation that assists in determining customer's identity and verifying the customer, as well as information on payers and payees of each monetary operation and transaction processed through the customer's account in the Company. The customer may be required to provide to the PAYAPP additional information or document regarding the customer, respective monetary operation or other transaction, or counterparty of such transaction.

Monitoring for Suspicious Activity

PAYAPP's AML policy includes customer's and beneficial owner's due diligence and ongoing AML monitoring and AML reporting policies. At various points in time, PAYAPP may request information regarding the transactions carried out through the customer's account opened at PAYAPP and the parties of the respective payment. If the customer may not respond sufficiently or within a timely manner, PAYAPP also reserves the right to reject any respective payments subject to the requirements of the applicable AML laws and regulations.

Prohibitions

PAYAPP has no AML risk appetite for customers who engage in any of the following:

- intentional or wilfully negligent breaches of law, regulation or policy applicable to money laundering and terrorist financing risk;
- repeated unintentional or repeated accidental breaches of AML laws;
- misusing the account for the purpose of money laundering or terrorism financing;
- misusing the account for the purpose of other fraud;
- facilitating business activities which could be construed as a tax offence;
- refusing to provide sufficient information or documentation to demonstrate compliance with the standards outlined in PAYAPP AML policy.

The Company has no risk appetite customers or transaction to or from jurisdictions which are identified as high-risk third countries on the lists of jurisdictions having serious deficiencies in their anti-money laundering regimes drawn up by the European Commission and the FATF, including but not limited, onboarding clients from or executing transaction to or from:

Afghanistan	El Salvador	Mali	Sierra Leone
American Samoa	Equatorial Guinea	Moldova	Somalia
Aruba	Eritrea	Myanmar	Sudan
Azerbaijan	Ethiopia	Morocco	South Sudan
Bahamas	Fiji	Mozambique	Sri Lanka
Bangladesh	Ghana	Nicaragua	Syria
Belarus	Guinea	Nigeria	Trinidad and Tobago
Bosnia and Herzegovina	Guinea-Bissau	Niger	Tunisia
Botswana	Guam	North Korea	Turkmenistan
Burkina Faso	Guyana	Oman	Uganda
Burundi	Haiti	Pakistan	US Virgin Islands
Cambodia	Iran	Palestine	USA
Central African Republic	Iraq	Panama	Venezuela
Congo	Jamaica	Qatar	Yemen
Congo, Democratic Republic	Kuwait	Russian Federation	Zambia
Cuba	Laos	Samoa	Zimbabwe
Dominican Republic	Lebanon	Saudi Arabia	
Egypt	Libya	Serbia	

PAYAPP intends to conduct business only with reputable customers who use their own products, services, and related accounts for legitimate purposes, and whose identities can be determined and verified. In keeping with that principle, the Company will not knowingly conduct business with customers that seek to process payments through the Company involving:

- Collecting donations as a charity or non-profit organization, NGO's (*unregulated and incorporated outside EU*);
- Dating (*newly incorporated, not known*);
- Drug paraphernalia - product or accessory that is intended or modified for making, using, or concealing drugs, typically for recreational purposes;
- Drugs / Illicit substances, steroids and certain controlled substances or other products that present a risk to consumer safety;
- Encourage, promote, facilitate or instruct others to engage in illegal activity;
- Extractive Industries;
- High Risk File hosting / sharing and cyberlockers;
- Infringe any duly registered copyrights/trademarks or other violation of intellectual property rights;
- Unregulated pharmaceuticals, illegal drugs and or unlicensed drug related activity;
- Involve offering or receiving payments for the purpose of bribery or corruption any form of high yield financial investments (get rich quick schemes);
- Items that encourage, promote, facilitate or instruct others to engage in illegal activity;
- Oil & Gas Industries;
- PC Support sold via outbound telemarketing;
- Pyramid or Ponzi schemes;
- Relate to the sale of dangerous or hazardous goods;
- Replicas;
- Sale of government ID's or documents;
- Scottish LP, LLP;
- Services associated with prostitution, escort;
- Stolen goods including digital and virtual goods (fictitious social media likes, spam emails);

- Unlicensed lottery and gambling;
- Unregulated crypto companies (except EU);
- Unregulated Forex;
- Violate any law, statute, ordinance or regulation;
- Weapons, firearms and ammunitions;

Please note that PAYAPP may suspend or terminate business relationship with the customer subject to the requirements of applicable AML laws and regulations.

Sanctions

PAYAPP has no AML Risk Appetite for establishing or maintaining a customer or a counterparty relationship with a natural person or legal entity designated on any of the below lists or where otherwise prohibited by applicable law or regulation.

PAYAPP also has no appetite to execute transactions relating to any such natural person or legal entity being included in:

- the United Nations Security Council Sanctions List (UN);
- the Consolidated List of European Union Financial Sanctions (EU);
- sanction lists administered by the United States Office of Foreign Assets Control (OFAC), including the List of Specially Designated Nationals and Blocked Persons;
- any other sanctions list.

In addition, PAYAPP pays particular attention to entities from countries which are on the list of non-cooperative countries and territories drawn up by the Financial Action Task Force (FATF) and to monetary operations or transactions performed by or on behalf of them.

If you have any questions regarding our AML policy, please contact our compliance@payapp.com

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