

Preamble

Anti-Money Laundering Policy Statement

This Statement sets out PayExpert Oü policy in relation to money laundering. It has the full support of the management.

The companies take their responsibilities to protect the customers purse very seriously and are fully committed to the highest ethical standards, in order to ensure the proper use and protection of funds and assets. The companies have an ongoing commitment to continue to improve its resilience to fraud, corruption (including bribery and money laundering) and other forms of financial irregularity.

The companies advocates strict adherence to its anti-fraud framework and associated policies. Whilst individual circumstances of each case will be carefully considered, in the majority of cases there will be a zero tolerance approach to fraud and corruption (including bribery and money laundering) in all of its forms. The company will not tolerate fraud or corruption by its employees, suppliers, contractors, partners or service users and will take all necessary steps to investigate all allegations of fraud or corruption and pursue sanctions available in each case, including removal from office, disciplinary action, dismissal, loss recovery and/or referral to the Police and/or other agencies. The management general belief and expectation is that those associated with it (employees, members, service users, contractors) will act with honesty and integrity.

This Anti-Money Laundering Policy is supplementary to the companies wider AntiFraud and Corruption Strategy (the Strategy), which sets out what actions the compliance proposes to take over the medium-term future to continue to develop its resilience to fraud and corruption. The Strategy sets out the key responsibilities with regard to fraud prevention, what to do if fraud is suspected and the action that will be taken by management.

What is Money Laundering?

Money laundering is the term used for a number of offences involving the proceeds of crime or terrorism funds. The following constitute the act of money laundering:

- Concealing, disguising, converting, transferring criminal property or removing or**
- Entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person; or**
- Acquiring, using or possessing criminal property;**
- Becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorist property (section 18 of the Terrorist Act 2000).**

These are the primary money laundering offences and thus prohibited acts under the legislation. There are also two secondary offences: failure to disclose any of the primary offences and tipping off. Tipping off is where someone informs a person or people who are, or are suspected of being involved in money laundering, in such a way as to reduce the likelihood of their being investigated or prejudicing an investigation.

Potentially any member of staff could be caught by the money laundering provisions if they suspect money laundering and either become involved with it in some way and/or do nothing about it. This Policy sets out how any concerns should be raised.

Money laundering also is the process of channelling 'bad' money into 'good' money in order to hide the fact the money originated from criminal activity. Money laundering often occurs in three steps: first, cash is introduced into the financial system by some means ("placement"), the second involves a financial transaction in order to camouflage the illegal source ("layering"), and the final step entails acquiring wealth generated from the transactions of the illicit funds ("integration").

Most money-laundering offences concern far greater sums of money since the greater the sum of money obtained from a criminal activity, the more difficult it is to make it appear to have originated from a legitimate source or transaction.

Whilst the risk to the companies of contravening the legislation is low, it is extremely important that all employees are familiar with their legal responsibilities: serious criminal sanctions may be imposed for breaches of the legislation. A key requirement is for employees to promptly report any suspected money laundering activity to the Chief Compliance Officer (CCO)

Scope of the Policy

This Policy applies to all employees of PayExpert Oü and aims to maintain the high standards of conduct which currently exist within the companies by preventing criminal activity through money laundering. The Policy sets out the procedures which must be followed (for example the reporting of suspicions of money laundering activity) to enable the companies to comply with its legal obligations.

Failure by a member of staff to comply with the procedures set out in this Policy may lead to disciplinary action being taken against them.

Any disciplinary action will be dealt with in accordance with the company's Disciplinary Policy.

What are the obligations on the Council?

Organisations conducting “relevant business” must:

- appoint a Compliance Officer (“CCO”) to receive disclosures from employees of money laundering activity (their own or anyone else’s);
- implement a procedure to enable the reporting of suspicions of money laundering;
- maintain client identification procedures in certain circumstances; and
- maintain record keeping procedures.

Not all of the companies business is “relevant” for the purposes of the legislation. with the law is to apply it to all areas of work undertaken by the companies; therefore, all staff are required to comply with the reporting procedure set out.

It is not allowed to accept payments to PayExpert Oü in cash (including notes, coins or travellers cheques in any currency).

PayExpert Oü will not make any payments in cash.

Identification

The first safeguard against money laundering is sophisticated Know-Your- Client (KYC) verification. To ensure compliance with standard AML regulations, we require you to submit the following documentation:

Proof of Identification: A clear copy of the front and back of your government-issued photo ID, i.e. a valid passport, driver’s licence, or national ID card.

Proof of Residence: An official document issued within the last 3 months, clearly stating your name and address as registered with ****. This can be a utility bill (i.e. water, electric, or landline), or bank statement. Please make sure your copy includes:

Your full, legal name

Your full residential address

Date of issue (within the last 3 months)

Name of the issuing authority with an official logo or stamp

Copy of the front and back of your credit card: To ensure your privacy and security, only the last 4 digits of your credit card must be visible. You can also cover the last 3 digits on the back of your card (CVV code).

Please note that regulatory requirements differ in certain countries and we may need to request further documentation from you.

You will not be able to trade until we have received and approved your “Know- your-Client” documentation. Any trades opened before your account is approved are liable to be cancelled. Any losses or profits these trades may have generated shall also be cancelled and removed from your account.

Monitoring

We do not accept third-party payments. All deposits must be made in your own name and match the KYC documents submitted. Due to AML regulatory policies, all funds withdrawn must be returned to the exact source from which they were received. This means that funds originally deposited via bank transfer will be returned to the same account when a withdrawal request is made. Equally, if you deposited via credit card, your funds will be returned to the same credit card when a withdrawal request is made.

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Reporting

AML regulation requires us to monitor and track suspicious transactions and report such activities to the relevant law enforcement agencies. We also reserve the right to deny a transfer at any stage if we believe the transfer to be connected in any manner to criminal activity or money laundering. The law prohibits us from informing customers about reports submitted to law enforcement agencies concerning suspicious activity.

Source of Wealth

As registered entities the companies are required to hold documentation regarding clients’ deposits and comply with the anti-money laundering

rules and regulations. In case you have deposited more than 50.000 USD you shall be requested to complete the “Source of Wealth” form, indicating the source of your wealth and attach all relevant supporting documents to justify your statements. If the information and evidence you provide are not satisfactory and do not justify your claims and deposits the Company shall request further documentation.”

If you fail to provide the requested documentation within a reasonable timeframe, your account will be blocked.

If you have any inquiries, please contact us via email: support@payexpert.com.