

Conception of protection of a financial institution against Money Laundering and Terrorist Financing and the basic principles of AML/CFT 2020

- 1) Trust Pay, a.s. with legal seat Za kásárňou 315/1, 831 03 Bratislava, Slovak Republic, ID 36865800, registered in the Commercial Register of District Court Bratislava I, Section Sa, File no. 4919 / B (hereinafter referred to as "TrustPay") is a payment institution, which in 2009 acquired permission granted by the National Bank of Slovakia (n. NBS OPK - 170931 / 2009 - nbs.sk) to provide payment services pursuant to Act no. 492/2009 Coll. On Payment Services (hereinafter referred to as the "PSA"). TrustPay is among the first-ever payment institutions in Slovakia.

Within the framework of the single European license, TrustPay is authorized to provide payment services in the European Economic Area.

TrustPay's activity is focused on providing payment services to merchants who sell their goods or services over the Internet. Merchants' customers enter their credit card sensitive data when purchasing goods or services over the Internet. TrustPay complies with all safety standards in regard to payments processing.

- 2) TrustPay is interested in a safe and legal provision and use of its services and for this purpose cooperates with local and national law enforcement authorities. National law enforcement authorities may, if general information related to the services provided by TrustPay is requested, contact the company via email info@trustpay.eu or by phone at +421 2321 68 450. Foreign law enforcement authorities may contact competent Slovak authorities to request assistance according to the European Convention on Mutual Assistance in Criminal Matters.**

- 3) TrustPay is fully aware of the risks arising from the possible misuse of its services for the money laundering and for financing of terrorism by means of business activities of certain clients. TrustPay has therefore formed a new conception of combating money laundering and financing of terrorism (hereinafter referred to as „AML“) which respects recognized international standards, regulations of the EU, legislation of the Slovak Republic as well as other norms in the area of prevention of money laundering and financing of terrorism.

AML comprises the basic principles which TrustPay applies regarding the relation with its clients as well as the relation with its own employees with the aim of eliminating the risk arising from the possible linking of the financial sector with the criminal and terrorist sphere. Trust Pay declares that:

a) it fully complies with the legislation of the European Union and the Slovak Republic in the area of prevention of the misuse of the financial system for purposes of money laundering and financing of terrorism (AML) and primarily with Act. No. 297/2008 Coll. on the protection against money laundering and on the protection against financing of terrorism and on the amendment and supplementation of certain acts. It also respects international standards in the area of AML and primarily the guidance of the Financial Action Task Force on AML;

b) it has formed its own conception of AML which complies with all legislative requirements of the European Union and the Slovak Republic and which all the employees are acquainted with by means of regular annual training sessions and by means of an internal directive;

c) its organizational structure is defined in proper and transparent manner, where the competence and responsibility for AML is determined in the by-laws and the internal rules. A department responsible for the implementation and fulfilment of AML principles is established and a person in charge of the AML is appointed;

d) it adheres to the policy and principles of "Know Your Client" in terms of which it is familiar with the true identity of its clients; in some instances, ownership relations and close links of clients – legal entities and ultimate beneficial owners are established; in certain cases an in-depth control of clients is performed in terms of which the source of their financial means

or property is identified and other information on the purpose and character of the business is ascertained;

e) it reviews all its potential clients' data, actual clients' data and transaction data in order to inspect their presence on international sanction lists of persons or movements supporting terrorism;

f) it processes and archives identification data of clients in accordance with § 19 of Act No. 297/2008 Coll. and in accordance with General Data Protection Regulation 679/2016;

g) it examines all intended and executed business activities from the perspective of possible unusualness. The accounts of its clients are monitored focusing on suspicious operations. The review is conducted by TrustPay's professionally trained employees as well as by means of technology at TrustPay's disposal which processes and evaluates data on clients and their business. In case the business is evaluated as unusual, the system of internal reports also serves as means of its reporting to the relevant authorities;

h) it does not open anonymous accounts and does not conduct business with clients who refuse to identify themselves. It also does not conduct business with fictitious banks or banks which reside in locations where the relevant jurisdiction is likely not to have implemented sufficient means of fighting against money laundering;

i) all its employees regardless of their position take part in annual AML training sessions;

j) it complies with obligations of prevention and control of money laundering and financing terrorism both prior to concluding a business agreement with a client or carrying out a particular business transaction via the means of client identification and verification of client identification as well as throughout the contractual relationship by means of continuous monitoring. Both cases may have a direct impact on the client as he may be subject to cooperation and performance of active measures in order to enable Trust Pay to fulfill its obligations of prevention and control.

The area of AML is regularly reviewed, updated and harmonized with international legislation norms and legislation norms of the EU and the Slovak republic.

All the above listed basic principles have been elaborated and specified in multiple internal regulations. One of the most important regulations is the "Program of own activities aimed against money laundering and financing of terrorism". The obligations and procedures elaborated in internal regulations are binding and obligatory for all TrustPay employees.

4) TrustPay declares that it has never been sanctioned or sued in connection with money laundering or financing of terrorism.