



Sanctions Compliance Statement

As a globally regulated Payment Service, E.PN shall comply with the sanction's laws and regulations of the United Nations, the European Union (EEAS), the United Kingdom (OFSI), the United States (OFAC) and all other applicable sanctions laws and regulations in all jurisdictions in which E.PN operates.

Accordingly, E.PN's Global Sanctions Policy identifies the following as the minimum standards to which E.PN shall comply:

- Verification of all customers and related transactions globally against sanctions lists established by, among others, the United Nations, the European Union, the United Kingdom and the United States;
- Screening against other local sanctions lists applicable to E.PN's activities in a particular jurisdiction;
- Prohibiting business activities, including initiating or continuing customer relationships, providing payment services or facilitating transactions that E.PN believes violate applicable sanctions laws or internal Global Sanctions Policies. This includes prohibiting business activities with individuals or entities on the sanctions list, or activities directly or indirectly related to countries or territories subject to comprehensive sanctions programs. Such countries and territories are currently Cuba, Iran, North Korea and Syria, as well as Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhya regions;
- Restricting transactions related to certain business activities involving, directly or indirectly, countries or persons subject to selective or targeted sanctions programs. These selective country programs prohibit transactions and services related to certain products or services and target certain industries or governments, including:
 1. Providing financing to the governments of Belarus, Libya, Sudan, or Zimbabwe;
 2. Certain activities involving the Government of Venezuela (the term 'Government of Venezuela' includes the State and Government of Venezuela, any political subdivision, agency or body thereof, including the Central Bank of Venezuela and Petroleos de Venezuela, S.A. ('PdVSA'), any person directly or indirectly owned or controlled by the foregoing, and any person who directly or indirectly acted or purported to act for or on behalf of any of the foregoing, including as a member of the Maduro regime);



3. Certain transactions and services related to the Russian financial, energy and defense sectors.
 - Investigation of all customer or transaction alerts that have been stopped E.PN. While E.PN endeavors to investigate these alerts and transactions within a reasonable timeframe, compliance with applicable sanctions legislation or internal Global Sanctions Policy may result in delays in processing customer transactions while additional verification and information is obtained about the nature of the underlying transaction or parties involved;
 - Blocking or rejecting transactions where E.PN is required to do so under applicable sanctions laws and regulations or its own internal Global Sanctions Policy. Transactions may also be returned to E.PN if there are no freezing or reporting obligations but the transactions are deemed to be outside E.PN's risk appetite;
 - Reporting breaches of sanctions laws to the relevant regulatory authorities. This may include any attempts by the client to circumvent sanctions laws.

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