

"All Pay Way" LLC

Anti-money laundering/counter terrorist financing (AML/CTF)

1. Introduction

The policy is designed to prevent money laundering and terrorist financing. This policy is a short version of the content of the AML/CFT policies/procedures and instructions existing in the basic framework of the system of the organization.

The purpose of the policy is to develop a system to combat money laundering and terrorist financing, to identify, analyze, manage and reduce risks, to ensure which the "All Pay Way " complies with the requirements of Georgian legislation, the present policy and its subordinate procedures and instructions have been developed based on the Law of Georgia on Facilitating the Prevention of Money Laundering and Terrorism Financing, as well as by-laws, guidelines and best international practices issued by the Financial Monitoring Service of Georgia and the National Bank.

The terms used in the policy have the meaning defined by the normative acts listed above and other policies and procedures of the organization.

The AML/CFT policy and instructions are approved by the director of the "All Pay Way", which is revised as necessary, based on changes in legislation and relevant international standards.

2. Internal control system

In order to prevent money laundering and terrorist financing, the "All Pay Way" has developed an internal control system, which consists of the following components:

- Internal policies and procedures
- Employees responsible for control - AML Department
- Risk-based approach
- Know Your Customer KYC procedure
- Data recording and storage
- Reporting
- Employee selection and training
- Approval of new products and services

3. Internal policies and procedures

The "All Pay Way" internal control is carried out in accordance with this policy, which is a general framework and defines the main principles, responsibilities and control mechanisms

for the prevention of money laundering and terrorist financing, at the same time, internal procedures and instructions have been developed that outline the control system and its mechanisms in the company.

This policy is available to all employees of the “All Pay Way”. It may also be shared with partners and potential partner organizations of the “All Pay Way”.

4. Employees responsible for control

The AML department is responsible for the combating the money laundering and terrorism financing in the organization. The main duties of the AML Department are as follows:

- Creation, development and management of the internal control system defined by the AML/CFT policy procedures in the organization
- Managing the customer identification/verification process
- Monitoring of transactions carried out by clients
- Preparation of reports on transactions/deals subject to monitoring and their timely submission with the Financial Monitoring Service of Georgia
- Timely submission of information requested by the National Bank of Georgia and the Financial Monitoring Service
- Preparation and timely submission of AML/CFT reports of the supervision of the National Bank of Georgia
- Coordination of the process during the on-site inspection (verification) of the National Bank of Georgia and the Financial Monitoring Service
- Organizing and conducting employee training on money laundering and terrorist financing control
- Performing any other functions related to measures to prevent money laundering and terrorist financing in the organization
- Employees of the AML Department are granted unlimited rights to receive any information/documents necessary for the performance of the above functions from other employees of the “All Pay Way”.

5. Risk-based approach

The basic principle of combating money laundering and terrorist financing is a risk-based approach. Products and clients of the “All Pay Way” are grouped into low, medium and high-risk categories. The basis of risk determination is the identification and assessment of risk factors relevant to money laundering and terrorist financing.

The purpose of the identification and assessment of the risk factors is to determine the appropriate control mechanisms for medium and high-risk category products and clients,

based on which it will be possible to minimize and manage the risks of money laundering and terrorist financing faced by the “All Pay Way”.

A detailed description of the risk factors and the risk assignment process is provided in the organization's internal procedure "Risk Assessment, Management and Preventive Measures"

6. Procedure Know Your Customer.

One of the important control mechanisms for reducing the risks of money laundering and terrorist financing is customer identification/verification and implementation of other preventive measures. It is prohibited to establish or continue a business relationship with the client if it is not possible to implement and/or complete the identification/verification of the client and other preventive measures. It is prohibited to open an anonymous e-wallet for the client and perform anonymous transactions.

Taking into account the risk-based approach, the preventive measures used in specific cases depend on which risk category the client belongs to. In this sense, the simplified preventive measures procedure is used for low-risk clients, the standard preventive measures procedure for medium-risk clients and enhanced preventive measures for high-risk clients.

A description of preventive measures and risk assignment is provided in the organization's internal use document/procedure: Risk Assessment, Management and Preventive Measures

7. Obligations in relation to a politically active person

Before establishing a business relationship with the client, it is determined whether the person belongs to a politically active person or a person related to him. Information is obtained both directly from the client and from results of verification in AML lists.

All politically active individuals and users associated with such individuals are assigned a high-risk status and enhanced preventive measures are implemented in connection with them.

8. Control of sanctions

Before executing a transaction or establishing a business relationship, the “All Pay Way” checks the customer's data in the list of international sanctions.

In case of a match in the lists, the customer registration process / transaction execution is stopped and the information is analyzed by the AML Department, after processing the existing information and collecting additional data, the AML Department makes a decision on customer service / transaction execution. In the event that any person participating in the transaction is included in the list of terrorists or persons supporting terrorism, the AML department (the specific AML officer) is obliged to provide immediately information to the

head of department, after which the said information is sent to the financial monitoring service with status of the suspicious reporting.

9. Data recording and storage

The “All Pay Way” records the following types of records and documentation:

- Requisites, documents and/or their copies presented for client identification.
- Information about the transaction (transaction), both in the form of an original (if any) and an electronic record
- Reporting forms and other related information submitted to the Financial Monitoring Service of Georgia

The “All Pay Way” stores such information/documents related to the transaction, which allows finding complete information about the transaction, for at least 5 years after the preparation, conclusion or execution of the transaction. Information/documents are systematized and stored in such a way that, if necessary (including their prompt submission to supervisory bodies, as well as the need to use them as evidence in criminal prosecution), it can be searched and retrieved in the shortest possible time.

To the stored documents (information) have access only those employees who have the right and obligation to view and process such information, the AML/operational/settlement (accounting) etc. department and/or in individual cases the specific employee of the “All Pay Way” who is granted such a right once, based on the appropriate order of the director.

10. Transaction monitoring

One of the priority tasks of the “All Pay Way” is to monitor transactions carried out by clients and to send reports on relevant operations to the Financial Monitoring Service of Georgia.

In case of reasonable doubt regarding the legality of the origin of the money used in the transaction or the reputation of the participant, the AML Department is obliged to submit immediately a report on the suspicious transaction to the Financial Monitoring Service of Georgia.

11. Selection and training of employees

Taking into account that cases of money laundering and financing of terrorism are often associated with the assistance of criminals by employees of financial institutions, enhanced candidate identification measures are implemented when recruiting new employees. When hiring employees, significant attention is paid to the reputation, qualifications and honesty of individuals.

All employees who participate in the process of establishing a business relationship with the client are trained to raise AML/CFT awareness.

Employees of the AML Department, in order to improve their professional skills and knowledge, take part in various trainings. The training should be of appropriate quality to raise awareness of the obligations and processes under the relevant regulatory rules.

12. Approval of New Products and Services

Before offering all new products and/or services to customers, as well as in case of significant changes in the specifications, innovations or changes of existing products or services, an assessment of the risk of money laundering and terrorist financing related to them is carried out. The AML department participates in the risk assessment process related to new products/services, whose recommendations must be taken into account before the final approval of the product/service design.

The assessment of the risks of money laundering and financing of terrorism is carried out even when considering the segmentation of services and the use of intermediary organizations in the management of processes.