

I. Basic information on Crea Pay s.r.o.

Identification number: 05330769

Registered seat (real physical premises within licensed jurisdiction): V jámě 699/1, 110 00 Prague, Czech Republic

Legal form: limited liability company

Record on incorporation: Commercial Register with the Municipal Court in Prague, Section C 262039, date: 23rd August, 2016

Financial license: small-scale electronic money issuer, issued by Czech National Bank, from June 1, 2017

Regulatory body: Czech National Bank (www.cnb.cz/en/)

II. Legal framework

The main principles of anti-money laundering and combating the financing of terrorism issues are based on the Act No. 253/2008 Coll., on Selected Measures against Legitimation of Proceeds of Crime and Financing of Terrorism (for more details please see <https://www.cnb.cz/en/supervision-financial-market/legislation/money-laundering/laws-andregulations/>).

The rules for implementation of anti-money laundering and combating the financing of terrorism policy and know your customer policy for Electronic money issuers are specified further by the Decree No. 67/2018 Coll., on Certain Requirements for the System of Internal Principles, Procedures and Control Measures against the Legitimation of the Proceeds of Crime and Financing of Terrorism (for more details please see <https://www.cnb.cz/en/supervision-financial-market/legislation/moneylaundering/laws-and-regulations/>).

Registration of beneficial owners and new requirements concerning the registration of beneficial owners of legal entities and legal arrangements under the V. AML Directive are transposed into the Act No. 37/2021 Coll., on the Registration of Beneficial Owners (for more details please see <https://www.financnianalytickyrad.cz/en/international-and-legalagenda/national-legislation.html>).

Obligations of natural and legal persons while implementing international sanctions for the purpose of maintaining or restoring international peace and security, protection of fundamental human rights and fight against terrorism are based on Act No 69/2006 Coll., on Implementation of International Sanctions (for more details please see <https://www.financnianalytickyrad.cz/en/international-and-legal-agenda/national-legislation.html>).

The above-mentioned documents order EMIs to

- implement own anti-money laundering system, combating the financing of terrorism system and know-your-customer policy,
- identify clients, incl. updating of the client's identification (not to open or maintain anonymous accounts or conduct business with shell banks),
- realize controls of the clients according to risk rating, provide periodic review and set trigger events scenarios,
- report any suspicious transactions (not only limited to specified transactions by Act No. 253/2008 Coll.) to the respective authorities,
- request and store specified information concerning transactions up to 10 years,

Crea Pay is operated by Crea Pay s.r.o., reg. no.: 05330769, recorded in the Commercial Register kept by the Municipal Court in Prague, Section C, file 262039.

Registered office address: V Jáme 699/1, Prague, 110 00 Czechia

Crea Pay s.r.o. is a licensed small-scale Electronic Money Issuer regulated by Czech National Bank.

- review customers and their transactions for possible terrorist connections.
- introduce training programs for all employees in Crea Pay regarding topics AML, KYC, CFT, S/E

III. Internal rules of Crea Pay s.r.o.

Responsibility for managing the prevention of anti-money laundering and combating the financing of terrorism risk lies not only with the Crea Pay Compliance department as the central unit for directing compliance, but it is also the duty of all managers and employees to whom the relevant rules and procedures apply. All employees, managers and top management are trained in all relevant topics AML, KYC, CFT, S/E and Code of Conduct.

Crea Pay s.r.o. has implemented complex measures, specified in internal documents and other relevant internal rules that fully comply with the above-mentioned Act and the Decree of the Czech National Bank. The standards defined in this Directive are the minimum requirements set out in order to comply with regulatory requirements regarding (i) the fight against money laundering and combating the financing of terrorism (AML/CFT) and (ii) international sanctions. Last update of the Directive was implemented in January 2023.

Internal rules:

- define basic principles and detail working procedures in daily implementation of anti-money laundering, combating the financing of terrorism and know-your-customer policy,
- set up procedures for Due diligence applicable to customers, including information about collection of necessary documents. Documents and information are different for different risky category of the client. Crea Pay has 2 risky categories.

For Individuals Crea Pay request as minimum but not limited: Full name; Date of birth; Place of birth; Identification number; Nationality (ies); Identity document fulfilling the following requirements; the type of document, dates and place of issuance; name and capacity of the authority or the person who issued the document and, if appropriate, has authenticated it; Residential address). For professionals is requested information about business and financial situation. Legal entity has to declare Legal name, registered address, legal form, identification number regulated status, ownership structure, Ultimate beneficiary owner (10% for clients with higher risk) up to 25%, Corporate purpose, type of business, revenue,

- define the use of on-line technical facilities for monitoring of transactions and reporting suspicious deals, using automatic alerts, AMLO alerts and external alerts,
- process for screening messages and database; require the check and screening process against PEP, Sanction and embargo, negative news, internal black list. Screening is provided during on boarding process, than during periodic control (weekly, monthly, quarterly) in the internal databases,
- cover process for relationship with politically exposed persons and close person, government ownership,
- procedure for termination of business relationship,
- specify procedures and check-up to prevent and detect the risk of money laundering and financing of terrorism,
- implement procedures for identification and disclosure of a suspicious transactions,
- review customers for possible terrorist connections,
- impose the key responsibility for implementation of the policy in the electronic money issuer on Compliance Unit and its Head with direct reporting to the Management, stipulate tasks, activities and responsibility of each involved electronic money issuer's Unit towards the policy, embody the best practice in this field,
- order to organize structured training courses for officers being in contact with customers or their transactions about principles of anti-money laundering and combating the financing of terrorism and the detection of such illegal activities at least once within twelve months,

- prohibit offering any anonymous account or maintaining business relationship with a shell bank, unlicensed bank.

None violation of principles against anti-money laundering, legitimisation of the proceeds of crime and financing of terrorism and know your customer policy has been detected by the regulator or involved institutions.