

INTERNAL PROCEDURE RULES AND INTERNAL CONTROL RULES

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The internal procedures for applying international sanctions and the Anti-Money Laundering and the Combating Financing of Terrorism Act are outlined in the International Sanctions Act, and the rules for their implementation are found in the internal control regulations.

I. GENERAL PROVISIONS

1. These regulations establish internal company security measures for conducting customer due diligence to control compliance with requirements for the prevention of money laundering and terrorist financing and for the disclosure of suspicious and unusual transactions.
2. The rules that govern sanctions are based on the International Sanctions Act (IAS), the Anti-Money Laundering and Combating Financing of Terrorism Act (AML/CFT), and the Directive (EU) 2024/1640 of the European Parliament and the Council.
3. The purpose of these rules is to increase the credibility and transparency of the business environment to prevent the financial system and the economic area of Curacao from being used for money laundering and terrorist financing.
4. These rules regulate and establish:
 - A. the basic principles of assessment, management, and reduction of risks associated with money laundering and financing of terrorism;
 - B. the procedure for applying customer due diligence measures in respect of the customer, including the procedure for applying simplified or enhanced customer due diligence measures;
 - C. responsibilities for data collection and related customer due diligence measures;
 - D. guidance on how to effectively determine whether the case is with a person who is connected with public authorities or with a person who is connected with local authorities (or other politically exposed persons) or with a person in respect of whom international sanctions are applied or with a person, whose place of residence or location is in the third country with the high risk;
 - E. the order of data collection, their security, and their accessibility;
 - F. models for identification of the customer and related risks;
 - G. methodology and guidance for determining if an obliged person is suspected in connection with money laundering and terrorist financing, or the case is with a

- suspicious transaction or circumstances, as well as guidance on compliance with notification requirements and procedures of reporting to the management;
- H. the order of management and assessment of related risks in connection with the available new technologies, services, and products, including new or unconventional sales channels or in connection with developing technologies;
- I. collection of information on account holders and the duties related to the disclosure.
5. The provisions of the procedural rules apply to all transactions related to business relations with customers, including transactions that are concluded with the help of agents, and in the manner prescribed in the Anti-Money Laundering and Combating Financing of Terrorism Act (hereinafter AML/CFT) when transferring commercial activities to a third party.
 6. The responsible person of the legal entity is the management board, the responsible person of the branch is the branch manager, or in case of their absence, the obliged entity should provide the employees whose responsibilities include the establishment of partnerships or transactions, for the fulfillment of obligations arising from this Act, due vocational training, which should continue after the employee starts execution of mentioned above responsibilities and after regularly or when necessary. In the course of training, among other things, information should be provided on the envisaged procedural rules, on modern methods of money laundering and the financing of terrorism and the risks involved, on the requirements for the protection of personal data, on methods of recognizing transactions that may be related to money laundering and financing terrorism, and guidelines for action in such situations.
 7. The management board of the enterprise is obliged to familiarize themselves with these rules and with its applications to all employees when applying for a job and in the future as necessary, but not less than once a year.
 8. The management board is required to confirm with the signature their acquaintance with this code.
 9. The management board is personally responsible for compliance with the requirements of the AML/CFT in a manner prescribed by law.
 10. The timeliness of this treatment is checked and supplemented regularly, but not less than once a year.
 11. Employees of the enterprise are required to know and strictly adhere to the provisions of the AML/CFT, as well as guidance on identifying signs of money laundering and terrorist financing in transactions, drawn up by the Financial Intelligence Unit, and based on the requirements of this code.

12. Employees of the enterprise should independently familiarize themselves with laws and other legal acts that are published on the Financial Intelligence Unit websites at least once a year.
13. The enterprise shall co-operate with each other and with government supervisory authorities, as well as with law enforcement agencies to prevent money laundering and terrorist financing, including the provision of information at their disposal and responding to requests within a reasonable time, following prescribed requirements, and adhering to the restrictions that are prescribed in legal acts.

II. DEFINITIONS

1. **Money laundering** — property obtained through criminal activity or obtaining property for participation in criminal activities:
 - A. conversion of property or transfer of property if it is known that such property was obtained as a result of criminal activity or with participation in it, to conceal the illegal origin of the property or to assist a person participating in criminal activity so that it evades the legal consequences of its actions;
 - B. acquisition, possession or use if, upon receipt, it has become known that it was obtained through criminal means or with participation in a crime;
 - C. the concealment or disguise of the true nature, origin, location, manner of disposal, rearrangement or concealment of property rights, or concealment of other rights related to property, or if it became known that such property was obtained as a result of criminal activity or with participation in a crime;
 - D. money laundering is a participation in the activity specified in section 2.1.1, connection to that, in an attempt to participate in it and in every way to facilitate and incite or provide favourable conditions or advice;
 - E. money laundering is regarded as such also in the case where a criminal activity that generated the property to be laundered was carried out in the territory of another country;
 - F. money laundering is regarded as such also where the details of a criminal activity that generated the property to be laundered have not been identified.
2. **The financing of terrorism** and financing activities for its commission is a terrorist illegal act in the sense of the 237³ Penal Code.

3. **The Financial Intelligence Unit** - serves as a national centre for the receiving (and, as permitted, requesting), analysis, and dissemination of suspicious transaction reports (STR) and other information regarding potential money laundering or terrorist financing. The FIU is to have access, directly or indirectly, on a timely basis to the financial, administrative, and law enforcement information that it requires to properly undertake its functions, including the analysis of STR. Contacts:

FIU Curaçao General information and Management: info@fiucuracao.cw

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4. **Cash** means cash within the meaning of Article 2(2) of Regulation (EC) No 1889/2005 of the European Parliament and the Council on controls of cash entering or leaving the Community (OJ L 309, 25.11.2005, pp 9–12).
5. **Property** means any object as well as the right of ownership of such object or a document certifying the rights related to the object, including an electronic document, and the benefit received from such object.
6. **Obligated entity** means a person specified in § 2 of the AML/CFT, including economic, vocational, and professional activities of the following persons:
- A. credit institutions;
 - B. financial institutions;
 - C. gambling operators, except for organizers of commercial lotteries;
 - D. persons who mediate transactions involving the acquisition or the right of use of real estate; traders within the meaning of the Trading Act, where a cash payment of no less than EUR 10 000 or an equal amount in another currency is made to or by the trader, regardless of whether the financial obligation is performed in the transaction in a lump sum or by way of several linked payments over a period of up to one year unless otherwise provided by law;
 - E. persons engaged in buying-in or wholesale of precious metals, precious metal articles or precious stones, except precious metals and precious metal articles used for production, scientific or medical purposes;
 - F. auditors and providers of accounting services;
 - G. providers of accounting or tax advice services;
 - H. providers of trust and company services;

- I. providers of a service of exchanging a virtual currency against a fiat currency;
 - J. providers of a virtual currency wallet service;
 - K. a central securities depository where it arranges the opening of securities accounts and provides services related to register entries without the mediation of an account operator;
 - L. undertakings providing a cross-border cash and securities transportation service;
 - M. pawnbrokers.
7. **Business relationship** means a relationship that is established upon conclusion of a long-term contract by an obliged entity in economic or professional activities for the provision of a service or sale of goods or distribution thereof in another manner or that is not based on a long-term contract, but whereby a certain duration could be reasonably expected at the time of the establishment of the contact and during which the obliged entity repeatedly makes separate transactions in the course of economic or professional activities while providing a service or professional service, performing professional acts or offering goods.
 8. **Customer** means a person who has a business relationship with an obliged entity.
 9. **Senior management of obliged entity** means an officer or employee with sufficient knowledge of the institution's money laundering and terrorist financing risk exposure and sufficient seniority to take decisions affecting its risk exposure, and need not, in all cases, be a member of the management board.
 10. **High-risk third country** means a country specified in a delegated act adopted based on Article 9(2) of Directive (EU) 2024/1640 of the European Parliament and the Council on the prevention of the use of the financial system for money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and the Council, and repealing Directive 2005/60/EC of the European Parliament and the Council and Commission Directive 2006/70/EC (OJ L 141/73, 05.06.2015, pp 73–117).
 11. **A contact person** is an employee who is appointed by the decision of the management board and who is the contact person of the Financial Intelligence Unit and regulates the implementation of established methods for preventing money laundering and terrorist financing. If a specific contact person is not appointed by the decision of the management board, in this case, the duties of the contact person are performed by the management board of the legal entity.

III. NATIONAL RISK ASSESSMENT

1. National risk assessment:

- A. it is envisaged to develop legal acts to prevent money laundering and terrorist financing and cover other areas and regulations with related areas, as well as the development of guidance for supervisory institutions and the need for their modification;
 - B. specifies, among other things, the sectors, fields, transaction amounts and types and, where necessary, countries or jurisdictions with regard to which obliged entities must apply enhanced due diligence measures and, where necessary, clarifies the measures;
 - C. specifies, among other things, the sectors, fields, transaction amounts, and types whereby the risk of money laundering and terrorist financing is smaller and where it is possible to apply simplified due diligence measures;
 - D. gives instructions to the ministries and authorities in their area of government regarding allocation of resources and setting of priorities for AML/CFT purposes.
- 2. Upon implementation of national risk assessment, relevant information, statistics, and analyses which have been published or made available to the ministries or authorities in their area of government, including relevant risk assessments, reports, and recommendations of international organizations and the European Commission are taken into account and collected, thereby taking account of data protection requirements.
 - 3. The generalized results of the national risk assessment are published on the website of the Ministry of Finance and immediately made available to obliged entities, the European Commission, European supervisory authorities, and the other Member States of the European Union.
 - 4. Based on the national risk assessment, the minister responsible for the field may by regulation establish limit amounts, requirements for monitoring a business relationship, or other risk-based restrictions aimed at mitigating the risks of money laundering or terrorist financing.

IV. MANAGING RISKS ARISING FROM THE ACTIVITIES OF THE OBLIGED ENTITY

- 1. For the purpose of identification, assessment, and analysis of risks of money laundering and terrorist financing related to their activities, obliged entities prepare a risk assessment, taking account of at least the following risk categories:
 - A. risks relating to customers;

- B. risks relating to countries, geographic areas, or jurisdictions;
 - C. risks relating to products, services, or transactions;
 - D. risk relating to communication, mediation or products, services, transactions, or delivery channels between the obliged entity and customers.
- 2. The steps taken to identify, assess and analyse risks must be proportionate to the nature, size, and level of complexity of the economic and professional activities of the obliged entity.
- 3. As a result of the risk assessment, the obliged entity establishes:
 - A. fields of a lower and higher risk of money laundering and terrorist financing;
 - B. the risk appetite, including the volume and scope of products and services provided in the course of business activities;
 - C. the risk management model, including simplified and enhanced due diligence measures, to mitigate identified risks.
- 4. Risk appetite means the total exposure level and types of the obliged entity, which the obliged entity is prepared to assume for its economic activities and attainment of its strategic goals, and which is established by the senior management of the obliged entity in writing. When applying the above, one should also take into account the risk that the obliged entity is ready to accept or that it wishes to avoid in connection with its commercial activities and with qualitative and quantitative mechanisms such as planned income, capital, or other methods used by other liquid funds, or other circumstances, such as reputational risks and money laundering and terrorist financing, or legal and other risks associated with unethical activities.
- 5. When applying Risk appetite to the risk, the obliged entity must at least determine those of the customer's characteristics that should be avoided in business relations and, in the presence of which, it would be necessary to apply the increased customer due diligence measures, including those when the obliged entity has to assess the risks associated with this customer and appoint the appropriate methods to reduce these risks.
- 6. The risk assessment and the establishment of the risk appetite must be documented, the documents are to be updated where necessary and based on the published results of the national risk assessment. At the request of the competent supervisory authority, the obliged entity submits the documents to the supervisory authority.
- 7. When applying the AML/CFT it is expected that an obliged entity that is the parent undertaking of a group applies group-wide rules of procedure and the internal control rules for controlling

adherence thereto regardless of whether all the undertakings of the group are located in one country or different countries. This obligation includes, inter alia, the establishment of a group-wide procedure for exchanging information on the AML/CFT and the establishment of similar rules for the protection of personal data. The obliged entity ensures that group-wide rules of procedure and the internal control rules for controlling adherence thereto take to the appropriate extent account of the law of another Member State of the European Union which implements Directive (EU) 2024/1640 of the European Parliament and of the Council, where the obliged entity has a representation, branch or majority-owned subsidiary in that Member State.

8. Where the obliged entity has a representation, branch, or majority-owned subsidiary in a third country where the minimum requirements for AML/CFT are not equivalent to those of Directive (EU) 2024/1640 of the European Parliament and the Council, the representation, branch and majority-owned subsidiary follow the rules of procedure and internal control rules complying with the requirements of this Act, including the requirements for the protection of personal data, to the extent permitted by the law of the third country.
9. Where the obliged entity identifies a situation where the law of the third country does not allow for implementing rules of procedure or internal control rules complying with the requirements of the AML/CFT in its representation, branch, or majority-owned subsidiary, the obliged entity informs the competent supervisory authority thereof. The competent supervisory authority notifies the Member States and, where relevant, the European supervisory authorities where it has become evident in accordance with the first sentence of this subsection that the law of the third country does not allow for applying rules of procedure or internal control rules complying with the requirements of Directive (EU) 2024/1640 of the European Parliament and the Council. In the case specified in this section, the obliged entity ensures the application of additional measures in the representation, branch, or majority-owned subsidiary so that the risks relating to money laundering or terrorist financing are effectively managed in another manner, informing the competent supervisory authority of the measures taken. In such an event the competent supervisory authority has the right to issue a precept demanding, inter alia, that the obliged entity or its representation, branch, or majority-owned subsidiary:

- A. refrain from establishing new business relationships in the country;
- B. terminate the existing business relationships in the country;
- C. suspend the provision of the service in part or in full;
- D. wind itself up;

- E. apply other measures provided for in regulatory technical standards adopted by the European Commission on the basis of Article 45(7) of Directive (EU) 2024/1640 of the European Parliament and the Council.
- 10. Within the group, information on a suspicion reported to the Financial Intelligence Unit may be shared, unless the Financial Intelligence Unit has ordered otherwise.
 - 11. Where a foreign service provider is an obliged entity and has a branch that has been registered **in the Commercial register of Curacao** or where a foreign service provider has a majority-owned subsidiary, it does not need to apply the group-wide rules of procedure or internal control rules to the extent that adherence thereto would conflict with the national risk assessment prepared based on the AML/CFT or with requirements established in or based on the AML/CFT.

V. CUSTOMER DUE DILIGENCE MEASURES

- 1. It is necessary to pay special attention to the person involved in the transaction or to the customer's activities and circumstances that indicate money laundering or the financing of terrorism, or to the obvious connection with money laundering or terrorist financing, including a complex transaction of a large volume, as well as an unusual transaction that does not have a specific financial purpose.
- 2. The following methods of due diligence are applied to customers:
 - A. identification of a customer or a person participating in an occasional transaction and verification of the submitted information based on information obtained from a reliable and independent source, including using means of electronic identification and trust services for electronic transactions;
 - B. identification and verification of a customer or a person participating in an occasional transaction and their right of representation;
 - C. identification of the beneficial owner and, to verify their identity, taking measures to the extent that allows the obliged entity to make certain that it knows who the beneficial owner is, and understands the ownership and control structure of the customer or the person participating in an occasional transaction;
 - D. understanding of business relationships, an occasional transaction or act and, where relevant, gathering information thereon;

- E. gathering information on whether a person is a politically exposed person, their family member, or a person known to be a close associate;
- F. monitoring of a business relationship.

3. Upon implementation of subsection V. 2. of this section, the obliged entity must understand the purpose of the business relationship or the purpose of the occasional transaction, identifying, inter alia, the permanent seat, place of business or place of residence, profession, or field of activity, main contracting partners and payment habits.
4. In the case of an occasional transaction made outside of a business relationship, the obliged entity gathers information on the origin of the property used in the transaction, instead of applying clause 4 of subsection V. 2. of this section.
5. A person participating in a transaction made in economic or professional activities, a person participating in a professional act or a person using a professional service or a customer submits, at the request of the obliged entity, documents required for application of the due diligence measures specified in clauses 1–4 of the subsection V. 2. of this section and provides relevant information. A person participating in a transaction made in economic or professional activities, a person participating in a professional act or a person using a professional service or a customer certifies by signature, at the request of the obliged entity, the correctness of the submitted information and documents submitted for the application of the due diligence measures.
6. The due diligence measures specified in clauses 1-5 of subsection V. 2. of this section must be applied **before the conclusion of the transaction, before and outside the partnership.**
7. **The identity of a customer or the customer's representative may be verified** on the basis of information obtained from a credible and independent source also at the time of the establishment of the business relationship, provided that it is necessary not to disturb the ordinary course of business. In such an event the verification of identity must be carried out as quickly as possible and before the taking of binding measures.
8. The obliged entity may choose the extent of performance of the duty and the need to verify the information and data used therefore with the help of a credible and independent source.
9. Due diligence measures to the business relationship may be applied in a simplified manner by the simplified procedure, provided that a factor characterizing a lower risk has been established and at least the following criteria are met:

- A. a long-term contract has been concluded with the customer in writing, electronically, or in a form reproducible in writing;

- B. the total value of incoming and outgoing payments in transactions made in the framework of the business relationship does not exceed EUR 15 000 a year.

VI. SIMPLIFIED CUSTOMER DUE DILIGENCE MEASURES

1. The obliged entity may apply simplified customer due diligence measures wherein the risk assessment prepared on the basis of the risk analysis, which is compiled by the obliged person, it is established that, in the case of the economic or professional activity, field or circumstances, the risk of money laundering or terrorist financing is lower than usual.
2. Before applying simplified customer due diligence measures to a customer, the obliged entity establishes that the business relationship, transaction, or act is of lower risk.
3. The application of simplified customer due diligence measures is permitted to the extent that the obliged entity ensures sufficient monitoring of transactions, acts, and business relationships, so that it would be possible to identify unusual transactions and allow for notifying of suspicious transactions in accordance with the procedure established in § 49 of the AML/CFT.

VII. ENHANCED CUSTOMER DUE DILIGENCE MEASURES

1. The obliged entity applies enhanced customer due diligence measures to adequately manage and mitigate a higher-than-usual risk of money laundering and terrorist financing.
2. Enhanced customer due diligence measures are applied always when:
 - A. upon identification of a person or verification of submitted information, there are doubts as to the truthfulness of the submitted data, authenticity of the documents, or identification of the beneficial owner;
 - B. the customer is a politically exposed person, except for a local politically exposed person, their family member, or a close associate;
 - C. the customer is from a high-risk third country or their place of residence or seat or the seat of the payment service provider of the payee is in a high-risk third country;
 - D. the customer or the person participating in the transaction is from such country or territory or their place of residence or seat or the seat of the payment service provider of the payee is in a country or territory that, according to credible sources such as mutual evaluations, reports or published follow-up reports, has not established effective AML/CFT systems that are in accordance with the recommendations of the Financial Action Task Force, or that is considered a low tax rate territory.

3. The obliged entity applies enhanced customer due diligence measures also where a risk assessment prepared on the basis of the AML/CFT identifies that, in the case of the economic or professional activity, field, or factors, the risk of money laundering or terrorist financing is higher than usual.
4. Enhanced customer due diligence measures do not need to be applied regarding the branch of an obliged entity established in a contracting state of the European Economic Area or a majority-owned subsidiary seated in a high-risk third country, provided that the branch and the majority-owned subsidiary fully comply with the group-wide procedures and the obliged entity assesses that the waiver to apply enhanced customer due diligence measures does not entail major additional risks of money laundering and terrorist financing.

VIII. ADDITIONAL CUSTOMER DUE DILIGENCE MEASURES

1. The obliged entity chooses additional customer due diligence measures to manage and mitigate an established risk of money laundering and terrorist financing that is higher than usual, choosing at its own discretion to apply one or several of the following due diligence measures:
 - A. verification of information additionally submitted upon identification of the person based on additional documents, data, or information originating from a credible and independent source;
 - B. gathering additional information on the purpose and nature of the business relationship, transaction, or operation and verifying the submitted information based on additional documents, data, or information that originates from a reliable and independent source;
 - C. gathering additional information and documents regarding the actual execution of transactions made in the business relationship to rule out the ostensibility of the transactions;
 - D. gathering additional information and documents to identify the source and origin of the funds used in a transaction made in the business relationship to rule out the ostensibility of the transactions;
 - E. the making of the first payment related to a transaction via an account that has been opened in the name of the person or customer participating in the transaction in a credit institution registered or having its place of business in a contracting state of

- the European Economic Area or in a country where requirements equal to those of Directive (EU) 2024/1640 of the European Parliament and the Council are in force;
- F. the application of due diligence measures regarding the person or their representative while being at the same place as the person or their representative.

2. Upon application of enhanced customer due diligence measures, the obliged entity must apply the monitoring of a business relationship more frequently than usual; including reassessing the customer's risk profile not later than six months after the establishment of the business relationship.

IX. GENERAL PRINCIPLES FOR VERIFICATION OF CUSTOMER'S IDENTITY

1. The client confirms the submitted information with his own signature.
2. When establishing partnership agreements with a natural person who is a permanent resident in a contracting state of the European Economic Area Agreement, it is possible to follow a simplified procedure for identification.
3. Before establishing a partnership with a politically exposed person, with family members of a politically exposed person or with close associates of a politically exposed person, the employee should receive permission from the management board, which decides the feasibility of establishing a customer relationship and provides the due guidance for further tracking of the customer relationship.
4. Before establishing a partnership with a politically exposed person, whose location is the third country with a high risk, where institutions have not adopted sufficient methods to prevent money laundering and terrorist financing, or this country does not cooperate with other countries in the field of preventing money laundering and terrorist financing, the employee should receive permission from the management board, which decides the feasibility of establishing customer relationship and provides the due guidance for further tracking of the customer relationship.
5. When establishing the identity of a customer a justifiable suspicion arises that it does not act on its own behalf or at its own expense, the employee should establish the identity of the person on whose behalf or at whose expense the customer acts.
6. If the identity of a person, on behalf of whom, or at whose expense the other person acts, **cannot be established**, in this case, the **employee is prohibited from making a transaction**. Also, the employee must immediately inform the Financial Intelligence Unit of the intention of the person to make the transaction or about the transaction that has already taken place.

7. Before providing the primary use of the offered service or establishing a partnership it is preferable to establish the identity of the customer, being with him physically in the same place.
8. When establishing the customer's identity a suspicion arises, an employee must ask for an additional identity document, in which there is a photograph, based on which it is possible to ensure the correct identification. In case of suspicion of document forgery signs, it is recommended to keep it, call for police assistance and pass a document that caused suspicion to a police officer. Use the assistance of a security officer or another person when possible. It is necessary to file a report to the Financial Intelligence Unit on this case.

X. IDENTIFICATION OF TRANSACTIONS AND CUSTOMER RELATIONSHIP

1. The obliged entity's employee applies the following procedural rules every time before the transaction with the customer or the establishment of the business relationship.
2. The obliged entity's employee clarifies the purpose and nature of the transaction and the establishment of the business relationship.
3. The obliged entity's employees are prohibited from making a transaction and signing an agreement with a customer who refuses to provide the data specified in the previous section, as well as with a customer for whom the employee has a suspicion that he may be a frontman; if the customer does not provide the required documents and necessary information or if based on the submitted documents the employee suspects that the case may be with money laundering or with the financing of terrorism.
4. The contact person of the Financial Intelligence Unit (the management board) should be informed immediately about the cases referred to in section 10.3, and as much data in the part of the customer, based on which will it be possible to establish the customer's identity the, later on, must be secured.

XI. NATURAL PERSON'S IDENTITY VERIFICATION

1. The obliged entity's employee establishes the customer's identity and, if necessary, the customer's representative identity, and also the following information in respect of the customer's and, if necessary, the customer's representative, must be secured:
 - A. name and surname;
 - B. personal identification code, in case of its absence, date of birth and place of birth, as well as the place of residence or location.

2. The obliged entity's employee verifies the correctness of the data specified in clauses 1, 2 of section 11.1 using information from an independent and reliable source.
3. The user is obliged to provide a scanned copy of the necessary identification documents. If it will be necessary employees can ask users to provide a certified copy of such documents.
4. Proceeding from part 2 of § 2 and part 4 of § 4 of the Identity Documents Act, the following effective documents are allowed to be used as the basis for the natural person's identity verification:
 - A. identity card;
 - B. digital identity card;
 - C. residence permit card;
 - D. national/foreign passport;
 - E. diplomatic passport;
 - F. the seaman's service book;
 - G. alien's passport;
 - H. temporary travel document;
 - I. refugee travel document;
 - J. a maritime certificate;
 - K. driver's license issued in a foreign country, if the owner's name, a photograph or facial image, signature or facsimile of the signature and date of birth or personal identification code are indicated in the document.
5. If the original document specified in clause 11.4 of this code cannot be seen, a notarized copy of the document and also notarized or officially certified copy of the document or the information from other independent and reliable sources, including the means of electronic identification and through electronic transactions, using in this case, the data control at least two different sources can be used to verify the identity.

XII. ACTUAL BENEFICIAL OWNER IDENTIFICATION

1. When establishing a legal entity, the obliged entity must register the actual beneficial owner of the legal entity. As a rule, it is assumed that the legal entity is represented by a legal representative or a person having a power of attorney for representation. In respect of powers of attorney and documents that were drawn up in foreign countries; it must be taken into account that they must be legalized or apostilled. When dealing with a document authorizing the rights

of representation, it is necessary to clarify the fact of whether the entity who issued the document had the authority to do so. The representative of the legal entity is expected to know about economic or professional activities, the purpose of the transaction, business partners, sources and origin of the funds used, the range of owners, and other knowledge.

2. Beneficial owner means a natural person who, taking advantage of their influence, makes a transaction, act, action, operation or step or otherwise exercises control over a transaction, act, action, operation or step or over another person and in whose interests or favour or on whose account a transaction or act, action, operation or step is made. In the case of companies, a beneficial owner is a natural person who ultimately owns or controls a legal person through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that person, including through bearer shareholdings, or through control via other means.
3. The obliged entity registers and keeps records of all actions taken to identify the beneficial owner.
4. Identification of the actual beneficial owner of a natural person:
 - A. when establishing a natural person's identity, the obliged entity is required in the case of suspicion to establish also the actual beneficial owner of a natural person in the sense of identifying the person who controls the activity of the audited person;
 - B. suspicion regarding the existence of the actual beneficial owner may appear primarily if, in applying the customer due diligence measures, the obliged entity has a suspicion that the natural person was inclined to create a business relationship or to conduct a transaction. In this case, it is necessary to consider that entity that controls a natural person is the actual beneficial owner of a natural person.

XIII. POLITICALLY EXPOSED PERSON IDENTIFICATION

1. A politically exposed person is an individual who performs the duties of public authority or performs significant duties of public authority, including the president of the republic, the head of government, the minister or deputy minister or minister's assistant, a member of parliament or a member of a state body similar to the parliament, a member of the state court or the supreme court, the state controller and a member of the central bank's management board, the ambassador, the charge d'affaires and the senior officer of the defence forces, the management board member of the state, a member of the administrative or supervisory authority, the head of

an international organization, a deputy's head and a member of the management, or a person who performs the same functions but does not have an official secondary or lower status level.

2. A person politically connected with local authorities is the person specified in clause XIII. 1. that performs or performed significant public authority duties in Curacao, in other countries which are the contracting states of the European Economic Area Agreement or in the European Union' institutions.
3. A member of the family of a politically exposed person at the state level or a politically exposed person at the local level is a spouse of a person or person who is considered to be a spouse of a politically exposed person at the state level or a politically exposed person at the local level, a child of a politically exposed person at the state level or a politically exposed person of the local level or spouse of a child of a politically exposed person at the state level or a politically exposed person at the local level or a person who is considered to be a spouse of a child of a politically exposed person at the state level or a politically exposed person at the local level, and a parent of a politically exposed person at the state level or a politically exposed person at the local level.
4. The close associate is an individual concerning whom it is known that he or she is about a legal entity or legal structure and he or she is the actual beneficial owner or co-owner together with a politically exposed person at the state level or with a politically exposed person at the local level or has close business relations with a politically exposed person at the state level or with a politically exposed person at the local level and an individual who is the only actual beneficial owner or of such legal entity's legal framework in respect of which it is known that it is indeed established by a politically exposed person at the national level or in favour of a politically exposed person at the local level.
5. In a situation where an economic or professional transaction or a participant in the performance of an official act, the customer or their actual beneficial owner is a politically exposed person of national level, a member of the family of a politically exposed person of national level, or a person who is a close associate of a politically exposed person of national level, then the obliged person applies the following customer due diligence measures:
 - A. receives approval from senior management to establish a partnership or to continue business relationships with that person;
 - B. applies methods of customer due diligence measures to establish the origin of the material wealth and the sources of funds that are used in partnerships or that are used for the transaction;

C. monitors these partnerships in an enhanced manner of customer due diligence and conducts regular enhanced monitoring, except for cases specified in legal acts.

6. If a politically exposed person of state-level no longer fulfils the public duties entrusted to him or her, then the obliged entity, for at least 12 months, must take into account the risks that have been associated with the person in question and apply the necessary and risk-based methods until it is sure that the risks inherent in a politically exposed person of a national level no longer arise.
7. The obliged entity may not apply the methods of customer due diligence described in this part to a politically exposed person of national level, to members of his or her family, and to persons who are considered his or her close associates, if no other circumstances are indicating the presence of other, higher than usual risks.
8. The obliged entity should establish the internal procedural rules based on which the decision shall be made whether the potential customer or the actual beneficial owner of the customer is a politically exposed person of state level, a politically exposed person of the local level of a county which is the contracting state of the European Economic Area Agreement or a third country or who performs or performed the public duties assigned to him or her in international organizations. The obliged entity should establish the close associates of a politically exposed person of state-level and members of his or her family only if their connection with the executor of important public duties is known to the public or when the obliged entity has reason to believe that such a relationship exists.
9. The obliged entity must apply the enhanced customer due diligence measures in addition to the necessary methods of customer due diligence concerning a politically exposed person of state-level including the following methods:
 - A. require the additional information from the customer, as well as to apply all necessary methods to establish sources of wealth and money that are used to establish business relationships or when conducting a transaction;
 - B. verify data or make inquiries to the relevant databases or open databases or make inquiries or verify data concerning the customer, or to the appropriate supervisory authorities at the customer's location or on official websites of government agencies.

The following data should be checked primarily:

- C. a politically exposed person of local level can be checked on the website of the Financial Intelligence Unit:
<https://www.politsei.ee/et/organisatsioon/rahapesu/kasulikku/>;
 - D. a foreign politically exposed person of national level can be identified using the NameScan database: <https://namescan.io/FreePEPCheck.aspx> HYPERLINK "<https://namescan.io/FreePEPCheck.aspx>", which has free access, or in any paid database (for example, Thomson Reuters, MemberCheck and others);
 - E. while checking a politically exposed person of local level, as well as a politically exposed person of national level, it is necessary to perform an additional check-up using Google, and also using local search systems in the country of origin of the customer, by entering the customer's name and date of birth both in Latin letters and using the local language.
10. The decision to establish a business relationship with a politically exposed person of national level must be taken by the management board of the obliged entity, the responsible member of the management board or the contact person. If a business relationship is established with the customer that will become later on or later it will become known that he or she or actual beneficial owner has become a politically important person of state level in the understanding of this guidance, then it is necessary to inform the management board, the responsible member of the management board or the contact person.

XIV. HIGH-RISK THIRD COUNTRY ACTING PERSON

1. The high-risk country is the third country which, on the basis of the Directive (EU) 2024/1640 of the European Parliament and of the Council, that regulates the counteraction to money laundering and the financing of terrorism of the financial system and which amends the Resolution (EU) 648/2012 of the European Parliament and of the Council and recognizes invalid, and the Directive (EU) 2005/60/EU of the European Parliament and of the Council and Commission Directive (EU) 2006/70/EU (EU page 141, 05.06.2015, pages 73-117), section 9 part 2, high-risk countries are listed (Annex 14) on the basis of these adopted acts.
2. High-risk third countries include Afghanistan, Bosnia and Herzegovina, Guyana, Iraq, Lao People's Democratic Republic, Syria, Uganda, Vanuatu, Yemen, Iran and North Korea.
3. If an obliged entity in the commercial or professional activity in the course of a transaction or in the performance of an official act interacts with the participating entity, with a customer, in

whose respect an official action is carried out, or with a customer from a high-risk third country, then the following customer due diligence measures should be applied:

- A. collection of additional information concerning the customer and the actual beneficial owner;
- B. collection of additional information regarding the content of the planned transaction;
- C. collection of information regarding the origin of funds and the wealth of the customer and the actual beneficial owner;
- D. collection of information regarding the reasons for planned or concluded transactions;
- E. obtaining permission from senior management to establish partnerships or to continue them;
- F. to intensify the monitoring of business relationship by increasing the number and frequency of control methods applied and selecting the parameters of transactions subject to additional verification.

4. In addition to the above, the obliged person may oblige the customer and require from the customer at the moment of making payments from the account of the customer whose location is in a contracting state of the European Economic Area Agreement, to apply the same measures that apply to credit institutions of third countries on the basis of the Directive (EU) 2024/1640 of the European Parliament and of the Council.

XV. MONITORING BUSINESS RELATIONSHIP

1. The obliged entity establishes principles for monitoring a business relationship established in economic or professional activities (hereinafter monitoring business relationship) according to the rules of internal procedures and internal control rules.
2. Monitoring business relationship must include at least the following:
 - A. checking of transactions made in a business relationship to ensure that the transactions are in consent with the obliged entity's knowledge of the customer, customer's activities and customer's risk profile;
 - B. regular updating of relevant documents, data or information gathered in the course of application of customer due diligence measures;
 - C. identifying the source and origin of the funds used in a transaction;

- D. in economic or professional activities, paying more attention to transactions made in the business relationship, the activities of the customer and circumstances that refer to criminal activity, money laundering or terrorist financing or that are likely to be linked with money laundering or terrorist financing, including to complex, high-value and unusual transactions and transaction patterns that do not have a reasonable or visible economic or lawful purpose or that are not typical for the given business specifics. In the performance of these duties, it is necessary to ascertain the presence of these transactions, the reason and the background, as well as other information to understand the meaning and content of transactions, and to pay more attention to these transactions;
- E. in economic or professional activities, paying more attention to the business relationship or transaction whereby the customer is from a high-risk third country or a country or jurisdiction specified in subsection 4 of § 37 of the AML/CFT or whereby the customer is a citizen of such country or whereby the customer's place of residence or seat or the seat of the payment service provider of the payee is in such country or jurisdiction.

XVI. DATA REGISTRATION, VERIFICATION AND STORAGE

1. The obliged entity registers the transaction date or period and a description of the substance of the transaction. In addition, the obliged entity registers:
 - A. information on the circumstances of the obliged entity's refusal to establish a business relationship or make an occasional transaction;
 - B. the circumstances of a waiver to establish a business relationship or make a transaction, including, an occasional transaction, on the initiative of a person participating in the transaction or professional act, a person using the official service or a customer where the waiver is related to the obliged entity's application of customer due diligence measures;
 - C. information according to which it is not possible to take the customer due diligence measures provided for in subsection 1 of § 20 of the AML/CFT using information technology means;
 - D. information on the circumstances of termination of a business relationship in connection with the impossibility of application of the customer due diligence measures;

- E. information serving as the basis for the duty to report under § 49 of the AML/CFT;
 - F. upon making transactions with a civil law partnership, community or another legal arrangement, trust fund or trustee, the fact that the person has such status, an extract of the registry card or a certificate of the registrar of the register where the legal arrangement has been registered.
2. The obliged entity must retain the originals or copies of the documents specified in §§ 21, 22 and 46 of the AML/CFT, which serve as the basis for identification and verification of persons, and the documents serving as the basis for the establishment of a business relationship no less than five years after termination of the business relationship.
 3. Arising from AML/CFT, the obliged entity must also retain the entire correspondence relating to the performance of the duties and obligations and all the data and documents gathered in the course of monitoring the business relationship as well as data on suspicious or unusual transactions or circumstances, which the Financial Intelligence Unit was not notified of, during the period of five years.
 4. The obliged entity must retain the documents prepared with regard to a transaction on any data medium and the documents and data serving as the basis for the notification obligations specified in § 49 of the AML/CFT for no less than five years after making the transaction or performing the duty to report.
 5. The obliged entity must retain the documents and data in a manner that allows for exhaustively and immediately replying to the enquiries of the Financial Intelligence Unit or, in accordance with legislation, those of other supervisory authorities, investigative bodies or courts, inter alia, regarding whether the obliged entity has or has had in the preceding five years a business relationship with the given person and what is or was the nature of the relationship.
 6. Where the obliged entity makes, to identify a person, an enquiry with a database that is part of the state information system, the duties provided for in this clause will be deemed performed where information on the making of an electronic enquiry to the register is reproducible over five years after termination of the business relationship or making of the transaction.
 7. Upon implementation of § 31 of the AML/CFT, the obliged entity retains the data of the document prescribed for the digital identification of a person, information on making an electronic enquiry to the identity documents database, and the audio and video recording of the procedure of identifying the person and verifying the person's identity for at least five years after termination of the business relationship

8. The obliged entity implements all rules of protection of personal data upon application of the requirements arising from the AML/CFT.
9. The obliged entity is allowed to process personal data gathered upon implementation of the AML/CFT only to prevent money laundering and terrorist financing and the data must not be additionally processed in a manner that does not meet the purpose, for instance, for marketing purposes.
10. The obliged entity submits information concerning the processing of personal data before establishing a business relationship or making an occasional transaction with them. General information on the duties and obligations of the obliged entity upon processing personal data for AML/CFT purposes is given in this information.

XVII. RESPONSIBLE MANAGEMENT BOARD MEMBER AND CONTACT PERSON

1. Where the obliged entity has more than one management board member, the obliged entity appoints a responsible management board member who is in charge of the implementation of this Act and legislation and guidelines adopted on the basis thereof. The obliged entity which is not a credit institution or financial institution may appoint a compliance officer for the performance of AML/CFT duties and obligations. Where no compliance officer has been appointed, the duties of a compliance officer are performed by the management board of the legal person, appointed responsible management board member or the director.
2. An employee or a structural unit may perform the duties of a compliance officer. Where a structural unit performs the duties of a compliance officer, the head of the respective structural unit is responsible for the performance of the given duties.
3. Only a person who has the education, professional suitability, abilities, personal qualities, experience and impeccable reputation required for the performance of the duties of a compliance officer may be appointed as a compliance officer.
4. The duties of a compliance officer include, inter alia:
 - A. organization of the collection and analysis of information referring to unusual transactions or transactions or circumstances suspected of money laundering or terrorist financing, which have become evident in the activities of the obliged entity;
 - B. performance of other duties and obligations related to compliance with the requirements of the AML/CFT.

5. A compliance officer has the right to:

- A. execute the transactions and monitor its compliance with the legislation of Curacao and with this guidance;
- B. receive data and information required for the performance of the duties of a compliance officer;
- C. make proposals for the organization of the process of submission of notifications of suspicious and unusual transactions;
- D. demand that a structural unit of the obliged entity eliminate within a reasonable time deficiency identified in the implementation of the AML/CFT requirements;
- E. receive training in the field.

6. The contact person can transfer the information or data that has become known to him in connection with the suspicion of money laundering only:

- A. The Financial Intelligence Unit;
- B. authority conducting an investigation in connection with the criminal case;
- C. court on the basis of a court order or a court decision.

7. Each employee of the obliged entity must inform the contact person about all cases of refusal to establish a commercial relationship on the basis of the AML/CFT, on suspicion of money laundering or unusual transactions, and cases of emergency refusal from the current contract.

XVIII. OBLIGATION TO REPORT OF SUSPECTED MONEY LAUNDERING AND TERRORIST FINANCING

1. Where the obliged entity identifies in economic or professional activities, a professional act or provision of professional service activity or facts whose characteristics refer to the use of criminal proceeds or terrorist financing or to the commission of related offences or an attempt thereof or with regard to which the obliged entity suspects or knows that it constitutes money laundering or terrorist financing or the commission of related offences, the obliged entity must report it to the Financial Intelligence Unit immediately, but not later than within two working days after identifying the activity or facts or after getting the suspicion. The above mentioned is applied also where a business relationship cannot be established, a transaction or operation cannot be made or a service cannot be provided, and upon the occurrence of the circumstances specified in §§ 42 and 43 of the AML/CFT.

2. The obliged entity, except for a credit institution, immediately but not later than two working days after the making of the transaction, notifies the Financial Intelligence Unit of each learned transaction whereby a pecuniary obligation of over EUR 32 000 or an equal sum in another currency is performed in cash, regardless of whether the transaction is made in a single payment or in several linked payments over a period of up to one year.

A. The obliged entity immediately submits to the Financial Intelligence Unit all the information available to the obliged entity, which the Financial Intelligence Unit requested in its enquiry.

3. The duty to report, as mentioned in this section, does not apply to other legal service providers, providers of accounting services or providers of advisory services in the field of accounting or taxation where they assess the customer's legal situation, defend to represent the customer in court, intra-authority or other such proceedings, including where they advise the customer in a matter of initiation or prevention of proceedings, regardless of whether the information has been obtained before, during or after the proceedings.

4. Where the obliged entity suspects or knows that terrorist financing or money laundering or related criminal offences are being committed, the making of the transaction or professional act or the provision of the official service must be postponed until the submission of a report that is mentioned in this section. Where the postponement of the transaction may cause considerable harm, it is not possible to omit the transaction or it may impede catching the person who committed possible money laundering or terrorist financing, the transaction or professional act will be carried out or the official service will be provided and a report will be submitted the Financial Intelligence Unit thereafter.

5. Where relevant, the Financial Intelligence Unit gives obliged entities feedback on their performance of the duty to report and on the use of the received information.

6. Place and form of performance of duty to report:

A. a report is submitted to the Financial Intelligence Unit of the contracting state of the European Economic Area Agreement on whose territory the obliged entity was established, is seated or provides the service;

B. a report is submitted via the online form of the Financial Intelligence Unit or via the X-road service;

- C. the data used for identifying the person and verifying the submitted information and, if any, copies of the documents are added to the report;
 - D. requirements for the contents and form of a notice submitted to the Financial Intelligence Unit and the guidelines for the submission of a report are established by a regulation of the minister responsible for the field.
7. The obliged entity, a structural unit of the obliged legal entity, a member of a management body and an employee is prohibited to inform a person, its beneficial owner, representative or third party about a report submitted on them to the Financial Intelligence Unit, a plan to submit such a report or the occurrence of reporting as well as about a precept made by the Financial Intelligence Unit. After a precept made by the Financial Intelligence Unit has been complied with, the obliged entity may inform a person that the Financial Intelligence Unit has restricted the use of the person's account or that another restriction has been imposed.

XIX. MONITORING THE EXECUTION OF THE PROCEDURAL RULES

1. The Financial Intelligence Unit and/or other competent bodies and institutions authorized by the relevant laws exercise supervision over the obliged entity's management board performance of the claims arising from the AML/CFT and legal acts issued on its basis.
2. The management board of the obliged entity, the responsible member of the management board or the contact person, if any, shall monitor the employees of the obliged entity the performance of claims arising from the AML/CFT and from legal acts issued on its basis.
3. Competence of employees of the obliged entity in respect of compliance with the AML/CFT and the legal acts issued on its basis:
 - A. in compliance with the requirements of the AML/CFT and the legal acts issued on its basis, at the time of the performance of actions, including those related to the application of customer due diligence measures, only those employees who are authorized by the obliged entity's management board or by a responsible member of the management board, and who has thoroughly acquainted with the relevant legislation, with information issued by the competent authorities, and with this manual, and also have exhaustive knowledge in the application of AML/KYC, have right to act and take decisions regarding the establishment of business relationships;

B. the obliged entity's employees and heads of structural units shall communicate in matters and in the performance of duties arising from the AML/CFT and legal acts issued on its basis, primarily with the contact person and, in his absence, with the responsible member of the management board. The responsible member of the management board always has the right to supervise the activities of the person, the structural manager and the contact person.

4. The fundamental obligations of the obliged entity's employees and of the structural division's managers regarding the customer due diligence based on the AML/CFT are as follows:

A. The obliged entity's employees and the structural divisions managers are required to strictly follow:

- Money Laundering and Terrorist Financing Prevention Act (AML/CFT);
- Directive (EU) 2015/849 of the European Parliament and of the Council;
- guidance and instructions of the Financial Intelligence Unit and other competent authorities;
- internal procedural rules and internal control requirements established by the obliged entity's management board;
- appropriate and lawful instructions of the obliged entity's management board, the responsible member of the management board and a contact person;

B. if the employee (or the structural unit manager) had a suspicion as to whether any method of customer due diligence or any related criterion was being performed (or whether the transaction or the establishment of partnerships was authorized) - the employee (or the structural unit manager) is obliged to immediately address to their immediate supervisor (or the structural unit manager, contact person, responsible member of the management board) with the appropriate request and stop the transaction or partnership relations before receiving a response to this request or receiving orders, how to proceed in the current situation.

5. The obliged entity establishes the following internal control system on the basis of the AML/CFT and the legal acts issued on its basis, and exercises control over the implementation of these procedural rules and internal control requirements:

- A. supervises and monitors the work of the obliged entity's employees:
- structural manager of the employee;

- in the absence of the structural manager of the employee, a responsible member of the management board and/or a contact person;
- the employee is obliged to submit all necessary data relating to the customer's identity and the partnership relations established with them, including the customer's personal information, data on the transaction made with the customer, results of the application of methods of customer due diligence and other essential information, to the structural manager or, in his absence, to a responsible member of the management board and/or to a contact person, not later than the next working day after data collection and termination of application of customer due diligence measures;

B. the activity of the obliged entity structural manager is monitored and controlled by the responsible member of the management board of the obliged entity and/or the contact person:

- the obliged entity's structural unit manager is obligated to submit all relevant information gathered by him or her personally or by his or her structural unit's employees concerning the obliged entity's customers' identities and the nature of the business relationships they create, to the relevant contact person or a responsible member of the management board, at least once a month;

C. the activities of the contact person of the obliged entity, if any, are monitored and controlled by a responsible member of the board or the management board:

- the contact person monitors the relevant data collected by the obliged entity's employees and the structural unit's manager relating to the obliged entity's customer identity and the established partnership with them and secures their safety in accordance with the relevant requirements of the AML/CFT and based on the instructions given in this guide. The contact person submits the relevant reports to the responsible member of the obliged entity's management board on a quarterly basis;

D. the activity of the responsible member of the obliged entity's management board is monitored and controlled by the management board or, on an exceptional basis, by the general meeting of shareholders or by a person, structural subdivision or

authority which was permanently or temporarily appointed by the general meeting of shareholders:

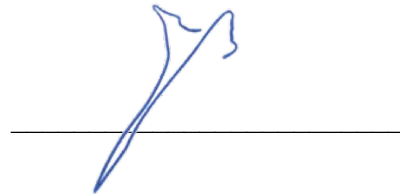
- in the absence of a contact person, the responsible member of the management board controls the relevant data transferred by the obliged entity's employees and

the structural unit manager that relate to the obliged entity's customer identity and to establish partnership relations, and secures their safety in accordance with the relevant requirements of the AML/CFT and based on the instructions given in this guide.

6. To fulfil the obligations arising from the AML/CFT, the obliged entity's contact person, the responsible member of the management board or the management board are required to periodically inform the employees of the enterprise on changes in legislation and on new approaches of the supervisory authorities, on the activities of an obliged entity, on changes in risk assessments and criteria for certain customers or groups of customers, about changes in the short or long-term enterprise doctrine, or on individual positions and directions (according with the market situation, in accordance with the political and economic situation, in connection with the orders of supervisory authorities, etc).
7. Violation of the duties of customer due diligence measures arising from the AML/CFT, failure to comply with the orders of a responsible member of the management board, the management board or the contact person, or not informing the Financial Intelligence Unit about suspected money laundering or financing of terrorism, either directly or through the structural unit manager, is sufficient basis to initiate disciplinary proceedings against the employee and/or in relation to the structural unit manager and for the termination of the employment.
8. The obliged entity's management board must ensure that sufficient resources are allocated in order to ensure compliance with the requirements of the AML/CFT and of this guidance and that employees who are involved in performing the requirements of the AML/CFT do act only on the condition that they are fully acquainted with the requirements of the AML/CFT and this guidance.
9. The obliged entity is not required to conduct an internal audit, except when required by a responsible member of the management board, the management board or by a general meeting of shareholders, or when the conduct of an internal audit is required by law.

These internal rules of procedure and internal control rules on the prevention of money laundering and the financing of terrorism were adopted and approved on **August 26, 2024** by the decision of the management board.

By UBO



Signature: Kostiantyn Vatan

CONTACT DETAILS OF THE FINANCIAL INTELLIGENCE UNIT

FIU Curaçao General information and Management: info@fiucuracao.cw

FIU Curaçao Supervision department: supervision@fiucuracao.cw

FIU Curaçao Analysis department: analysis@fiucuracao.cw

Telephone: + (599 9) 462 6588

Fax: + (599 9) 462 6522

WEB https://portal.fiucuracao.cw/goAMLWeb_PRD/Home

The electronic form for submitting reports to the Financial Intelligence Unit (goAML):

https://portal.fiucuracao.cw/goAMLWeb_PRD/Home

Member States of the European Union and the contracting states of the European Economic Area Agreement:

[https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:European_Economic_Area_\(EEA\)](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Glossary:European_Economic_Area_(EEA))

List of high-risk countries:

<http://www.fatf-gafi.org/countries/#high-risk>

Samples of apostils from different countries:

<https://arbat25.su/en/samples-from-different-countries-apostille>

Control of validity of the documents:

<https://www.politsei.ee/et/teenused/e-paringud/dokumendi-kehtivuse-kontroll/>

Electronic register for verification of valid identity documents and travel documents:

<http://www.consilium.europa.eu/prado/ET/prado-start-page.html>

Sources for verification of politically exposed persons at local level:

<https://www.politsei.ee/et/organisatsioon/rahapesu/kasulikku/>

The NameScan database, which contains data of politically exposed persons of the national level of foreign states:

<https://namescan.io/FreePEPCheck.aspx>