

Schedule 4

PayBitoPro

Financial Crime Compliance Policy
(FCC Policy)

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Anti-Money Laundering Policy

1. Introduction

To facilitate compliance with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) laws and regulations, PayBitoPro has developed an AML Program, consisting of policies, procedures, standards, and principles (Policies). All staff members are required to adhere to these Policies to protect PayBitoPro and its reputation from being misused for money laundering and/or terrorist financing or other illegal purposes.

2. What is Money Laundering and Terrorist Financing

Money laundering is the process of making illegally-gained proceeds (i.e., dirty money) appear legal (i.e., clean). Typically, it involves three steps: placement, layering, and integration. First, illegitimate funds are introduced into the legitimate financial system. Then, the money is moved around to create confusion, sometimes by wiring or transferring through numerous accounts. Finally, it is integrated into the financial system through additional transactions until the “dirty money” appears “clean”.

Terrorist financing provides funds for terrorist activity. It may involve funds raised from legitimate sources, such as personal donations and profits from businesses and charitable organizations, as well as from criminal sources, such as the drug trade, the smuggling of weapons and other goods, fraud, kidnapping, and extortion.

3. Governance Framework

The Head of Compliance has been tasked by the Board to oversee and manage FCC and AML-related matters. PayBitoPro has assigned the Head of Compliance as the Global Money Laundering Reporting Officer (GMLRO) who reports directly to the Financial Crime Compliance Committee (FCCC, consisting of the CEO, Head of Information Security, and Head of Human Resource) and the Board and has the competence, means, and access to all information, data, records, and systems in the enterprise he/she deems necessary to fulfill his/her functions. The GMLRO is responsible for establishing and maintaining PayBitoPro’s AML Program to identify, assess, monitor, and manage risks related to money laundering, terrorist financing, and other financial crimes.

4. Policies and Procedures

The AML Program includes policies and procedures outlining its general AML standards and principles. All policies and procedures documents are designed to ensure that these standards and principles are implemented into day-to-day business. These policies and procedures are published on a global policy platform that all employees and staff have access to. They are subject to an annual review cycle to ensure their conformity and adherence with prevalent AML regulations.

5. Standards and Principles

These AML standards and principles set out the minimum controls PayBitoPro adheres to

Performing Know Your Customer (KYC) and Customer Due Diligence (CDD) to identify and verify all customers, to establish and/or maintain business relationships using a Risk-Based Approach (RBA).

Implementing processes and systems designed to monitor customer transactions for the purpose of identifying suspicious activity, and reporting such activity, if deemed necessary, to the appropriate regulatory bodies.

Conduct periodic reviews on client accounts to ensure client information and risk profiles are accurate and up to date.

Assessing and testing the effectiveness of the AML Program and regular AML training for its staff and employees.

PayBitoPro will not enter client relationships with the following persons including individuals and entities:

Sanctioned or embargoed parties on the sanction lists issued by the United Nations (UN Sanctions), European Union (EU Sanctions), the Office of Foreign Assets Control of the United States (US OFAC Sanctions), the Office of Financial Sanctions Implementation HMT (UK OFSI Sanctions) or equivalent or similar sanction lists.

Residents in countries or jurisdictions identified by the Financial Action Task Force (FATF) as high-risk jurisdictions are subject to a call for action.

Persons using fictitious names or engaging in illegal business (unauthorized business or narcotics and marijuana).

Unlicensed banks or unlicensed NBFi (Non-Bank Financial Institution).
Shell banks or entities that provide services to shell banks.

PayBitopro does not allow itself to be a vehicle to facilitate tax evasion and its employees and staff are committed to prevent the facilitation of tax evasion.

All data obtained according to client identification and AML measures must be documented. Records must be kept for a minimum of 5 years, subject to longer retention periods if required by the local jurisdiction.

Sanctions Policy

1. Introduction

As a global Financial Technology(FinTech) institution, PayBitoPro is committed to complying with the legal and regulatory obligations in the global environment we operate. Any breach of sanctions may have a serious impact on our reputation and ability to provide products and services to our clients. Therefore, documents regarding Sanctions have been put in place to protect our reputation and other legitimate business interests.

2. What is a Sanction?

Sanctions are restrictions on activity with targeted countries, governments, entities, individuals, and industries that are imposed by bodies such as the United Nations (UN), the European Union (EU), individual countries or groups of countries.

3. Standards and Principles

PayBitoPro sets out the following minimum standards:

Screen customers against the sanction lists issued by the UN, EU, UK, and the US, including the Office of Foreign Asset Control (OFAC).

Screen locally against other sanction lists that apply to PayBitoPro's operations in a particular jurisdiction.

Prohibit customers that are a target or subject from the above-mentioned sanction lists.

Prohibit business activity, including prohibitions on commencing or continuing customer relationships or providing products or services or facilitating transactions that PayBitoPro believes may violate applicable sanctions laws or PayBitoPro's Sanctions Policy.

Block or reject transactions where PayBitoPro is required to do so under applicable sanctions laws or regulations or PayBitoPro's Sanctions Policy.

Report breaches of sanction laws to the relevant regulatory authorities. This can include any attempt by a customer to evade sanction laws.

In order for us to ensure compliance with any sanctions program, customers may be required to furnish PayBitoPro with additional information as and when necessary. We may also be required to take appropriate measures if the business relationships result in a risk to PayBitoPro.

Fraud Prevention and Investigation Policy

1. Introduction

The purpose of Fraud Prevention and Investigation is to facilitate the development of controls that will aid in the detection and prevention of fraud against PayBitoPro and its associated entities. It is the intent of PayBitoPro to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of the investigation.

2. Scope of Policy

This policy applies to any irregularity, or suspected irregularity, involving employees as well as senior management, consultants, vendors, contractors, agencies or any other external parties with a business relationship with PayBitoPro. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to PayBitoPro.

3. Who is Responsible?

Heads of all functional units are responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity.

Any irregularity that is detected or suspected must be reported immediately to the Compliance team, who coordinates all investigations with the Legal consultant if deemed necessary, and other affected areas, both internal and external.

Irregularities concerning an employee's moral, ethical, or behavioral conduct should be resolved by CEO and the Human Resource team rather than Compliance team. If there is any question as to whether an action constitutes fraud, contact the Compliance team for guidance.

4. What Constitutes Fraud

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

Any dishonest or fraudulent act.

Misappropriation of funds, securities, cryptos, supplies, or other assets.

Impropriety in the handling or reporting of money or financial transactions.

Profiteering as a result of insider knowledge of company activities.

Disclosing confidential and proprietary information to outside parties.

Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to PayBitoPro. Exception: Gifts less than \$50 in value.

Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment.

Any similar or related irregularities.

5. Investigation

The Compliance team has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, the Head of Compliance shall report to CEO to determine whether the case shall be discussed in FCCC and then further escalated to the Board.

Decisions to refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with the MLRO (and/or Legal Counsel if deemed appropriate) and the Head of Information Security, as will the final decisions on the disposition of the case.

6. Confidentiality

The Compliance team shall treat all information received confidentially. Any employee who suspects dishonest or fraudulent activity will notify the Compliance team immediately, and

should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect PayBitoPro from potential civil liability.

7. Authorization

Members of the Compliance team will have:

7.1. Free and unrestricted access to all PayBitoPro records and premises, whether owned or rented.

7.2. The authority, on a need basis, to examine all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

8. Reporting Procedures

Great care must be taken in the investigation of suspected improprieties so as to avoid mistaken accusations or alerting suspected individuals that an investigation is underway.

An employee who discovers or suspects fraudulent activity will contact the Compliance team immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Compliance team or Legal Counsel when employed. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

Do not contact the suspected individual in an effort to determine facts or demand restitution.

Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Legal Counsel or Compliance team.

9. Termination

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by the Head of Human Resources and the Legal Counsel, if necessary, before any such action is taken. The Compliance team does not have the authority to terminate an employee. The decision to terminate an employee is made by the employee's management. Should the Compliance team believe the management decision inappropriate for the facts presented, the facts will be presented to executive-level management for a decision.

10. Administration

The Compliance Department is responsible for the administration, revision, interpretation, and application of this policy. This policy will be reviewed annually and revised as needed.

Anti-Bribery and Corruption Policy

1. Introduction

PayBitoPro conducts its business professionally, with integrity, and in compliance with the laws which are applicable to us. The penalties for violating these laws can be severe, both for the company and for the individuals involved. PayBitoPro is therefore committed to high ethical standards and has zero tolerance for actions and activities that knowingly breach bribery and corruption policies, regulations, and laws.

2. Scope of Policy

The principles and obligations outlined in this Policy apply to all employees and staff, and contractors which include agents, consultants, outsourced personnel, and other representatives. All employees and staff are encouraged to report all cases of suspected corruption either to their line manager, to another member of management or to the Compliance Department. Any violation of this Policy may result in disciplinary action, up to and including termination of employment as well as possible legal consequences.

3. What Is a Bribe?

The offering, promising, giving, authorizing, requesting, or receiving of financial or non-financial advantage or anything of value; or

If the purpose of the payment is to secure the improper performance of or misuse of a person's position.

4. Prohibition of Bribery

No person who is subject to this Policy shall:

Offer, provide, or authorize a bribe or anything which may be viewed as a bribe either directly or indirectly or otherwise through any third party; or

Request or receive a bribe or anything which may be viewed as a bribe either directly or indirectly or otherwise through any third party, or perform their job functions improperly in anticipation, or in consequence, of a bribe.

5. Reporting of Suspected Bribery

PayBitoPro requires all employees and staff to act honestly, with fairness and integrity in the performance of their services for or on behalf of PayBitoPro. If you are aware of possible bribery, you are obligated to report your knowledge or suspicion to the Global Money Laundering Reporting Officer (MLRO).