

«Approved»

Director

LLC «Super Payment»

«13» July 2023

_____ Yana Tokhunts

SANCTION SCREENING POLICY

LLC «Super Payment»

Republic of Kazakhstan, Almaty

July 2023

<i>SANCTION SCREENING POLICY</i> <i>LLC «Super Payment»</i>	<i>Version 1.0</i>
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Article 1: GENERAL PROVISIONS

- 1.1. This Sanctions Review Policy (the Policy) sets out the requirements and procedures to facilitate compliance with the Sanctions Laws.
- 1.2. The Company complies with sanctions and embargoes against individuals, organizations and countries imposed by the Financial Monitoring Agency of the Republic of Kazakhstan, the National Bank of the Republic of Kazakhstan, the European Union and the UN Sanctions Committee, acting in accordance with UN Security Council resolutions.
- 1.3. SuperPayment LLP (the Company) strives to conduct business in accordance with the highest ethical standards. This includes compliance with all applicable sanctions regulations (the "Sanctions Laws"). The Company is required to comply with laws that impose trade and financial restrictions on transactions with certain countries, entities and individuals.
- 1.4. This Policy applies to all Company employees and companies that engage in business transactions and relationships with third parties. This includes customers, partners, agents, financial institutions, including banks, trading counterparties and service providers.
- 1.5. The Company requires employees to comply with all applicable sanctions laws.

Article 2: Terms and Definitions

These Policy use the concepts provided for by the Payments Act, as well as the the following terms and abbreviations:

FATF (Financial Action Task Force)	An independent intergovernmental body aimed to protect the global financial system from the risk of money laundering, terrorist financing, and the proliferation of weapons of mass destruction. The FATF Recommendations are recognized as a global standard for money laundering and counterterrorist financing.
High-risk jurisdiction	List of countries identified by the provider in the corresponding document - "List of high-risk jurisdictions, offshore zones, suspicious zones" https://www.fatf-gafi.org/en/publications/high-risk-and-other-monitored-jurisdictions/documents/call-for-action-october-2022.html
Sanction lists	lists of entities and persons subject to sanctions (resolutions) by the competent authorities of foreign states;
Suspicious area	A country or part of a country that, based on information available to the Provider, is considered to have weak anti-money laundering controls

Article 3. Definitions of Sanctions and how to comply with them

3.1. Economic and financial sanctions are laws that are typically used to combat terrorism, nuclear proliferation, and/or internationally condemned activities by restricting the types of economic activity that can be conducted under the sanctions. Sanctions are imposed by many countries and several international organizations. They target countries as well as many entities and individuals.

The most significant sanctions for the Company's business are those of the Republic of Kazakhstan, the EU, and the United States. The main types of activity that are typically restricted by the Republic of Kazakhstan, the EU, and/or the United States sanctions laws are:

- Transactions with designated entities or individuals (entities and individuals that are listed as subject to targeted sanctions, i.e., are subject to an asset freeze, as described below) and are prohibited from providing funds or economic resources to them);
- Exports and re-exports to a sanctioned country (either in respect of all goods or services or of specific types of goods or services);
- Imports from, or transactions in, property originating from, a sanctioned country (either in respect of all goods or services or certain types of goods or services);
- Travel to or from a sanctioned country;
- New investments and other transactions in a sanctioned country, including transactions with its government, nationals, and entities organised under its laws, or investments in certain sectors or entities;
- Payments through a bank headquartered in the EU or the US related to a sanctioned country, entity, or individual; and
- Participation (or approval) by Kazakhstan, EU, or US companies or nationals in contracts involving a sanctioned country, entity, or individual (e.g., a payment instruction).

Article 4. Asset Freezing Sanctions

4.1. Both Kazakhstan and other countries have imposed asset freezing measures on a number of different jurisdictions. Asset freezing sanctions apply to individuals and/or entities listed by the relevant jurisdiction as a "designated person" (for Kazakhstan, EU purposes) or a "Specially Designated National" or "SDN" (for Kazakhstan, US purposes).

4.2. The asset freeze measures require the "freezing" or "blocking" of property (including funds) owned or controlled by the asset freeze target, meaning that any transactions with those funds or property are prohibited (this includes a prohibition on receiving payments from the asset freeze target). The asset freeze restrictions also prohibit engaging in many other transactions with designated persons/SDNs, including making payments or providing goods or services to a designated person or entity (although certain types of transactions for the purpose of the asset freeze may be licensed by the relevant authorities).

4.3. The restrictions may also apply to entities owned or otherwise controlled by a designated person or SDN.

4.4. The lists of individuals and entities subject to US and EU asset freeze restrictions can be found on the following websites:

<https://sanctionssearch.ofac.treas.gov/> (US asset freeze target list)

<http://hmt-sanctions.s3.amazonaws.com/sanctionsconlist.htm> (EU asset freeze target list)

<https://websfm.kz/terrorism> (list of entities and individuals associated with terrorist and extremist financing)

Database for determining customer status, sanctions, negative information

<https://traderadar.kz/>

4.5. The countries subject to the most restrictive and broad-based international sanctions are listed in the high-risk list below. All of these countries have restrictions on the supply of certain goods and services, in addition to being significant lists of entities and individuals in countries where subject to targeted sanctions (asset freezes).

4.6. There are also many other countries (see Medium/Low Risk List below) that have lists of individuals and entities subject to asset freeze measures that prohibit most transactions with those individuals (including any payments to or from them, or any other transfer of goods or assets to or from them, as noted above). Although these countries are considered lower risk, you should still check whether you are dealing with individuals on these or other sanctions lists.

4.7. The Republic of Kazakhstan, the US and the EU also impose sanctions on entities and individuals associated with terrorism and terrorist organisations. These sanctions are different from the country-specific measures mentioned above, but compliance with these sanctions will also be achieved by checking whether you are doing business with individuals on the list.

Article 5. Procedures for verifying customer (representative) and beneficial owners' data on sanctions lists and lists of the authorized body

5.1. Lists of the authorized body are posted on the official Internet resource of the authorized body. The sanctions lists are posted on the websites of the competent authorities of foreign states and organizations.

5.2. The Responsible Employee, if necessary, has the right to independently identify additional lists (lists) of persons related to the bad faith of customers, including foreign states (territories), domestic territories, characterized by a high risk of money laundering and terrorist financing.

5.3. The review of the client (its representative), beneficial owner against the lists of the competent authority/sanctions lists is carried out by the responsible employee/Compliance Department, regardless of the level of risk:

- When conducting due diligence activities on a customer (representative), beneficial owner, including an officer and participant, as part of a business relationship;
- Within 24 hours of the posting of a list of persons involved in terrorist activity on the official internet resource of the authorized body of the list of persons involved in terrorist activity, information on the inclusion of the organization or person in the list of organizations and persons associated with the financing of terrorism and extremism, as well as the list of organizations and persons associated with the FROM.

5.4. In the event that the client and/or its representative and/or members and/or officers and/or beneficial owner are in full agreement with the data of the list of the competent authority and/or the list of the United Nations Security Council ("UN"):

- 1) in establishing a business relationship - the Provider refuses to establish a business relationship with the client, in the manner provided for by Article 31 of Rules of Internal Control;
- 2) if a match is found for a customer with whom a business relationship has already been established (when inspected against updated lists) - the Provider performs activities to freeze the operations of such customer in the manner provided for by Article 30 of Rules of Internal Control, except in the case provided for by paragraph 5 of this article.

5.5. In the event that at least one of the parties to the transactions is a person included in the list of organizations and persons associated with the FROM, and the transactions are carried out within the framework of contracts concluded before such persons are included in the list of organizations and persons associated with the FROM, the Provider shall immediately inform the regulatory authority about such transactions (excluding transactions for crediting money) by sending an electronic message to the SDF.

The competent authority, having received the email provided for in part one of this paragraph, shall suspend the transaction for up to 15 business days within 24 hours of receipt.

The Provider shall not conduct a transaction with money and (or) other property, the electronic communication of which has been provided in accordance with part one of this paragraph, until the decision of the authorized body to suspend the transaction.

The decision to suspend the operation shall be communicated to the Provider electronically or on hard copy.

If the Provider does not receive within 24 hours of reporting information, the decision of the competent authority to suspend the operation shall be carried out, unless there are other grounds provided for by the laws of the Republic of Kazakhstan that prevent the operation from being carried out.

The competent authority shall, after the decision to suspend the operation within three business days, decide whether or not to conduct the operation and shall inform the Provider.

Upon expiration of the term of suspension of the operation by the decision of the competent authority, the operation should be performed in the absence of other grounds provided for by the laws of the Republic of Kazakhstan that prevent the operation from being performed.

The decision to perform the transaction may be made if the following requirements are met:

- 1) The contract is not connected with any prohibited items, materials, equipment, goods, technology, assistance, training, financial support, investment, brokerage or services specified in the United Nations Security Council documents relating to the prevention, prevention and cessation of the proliferation of weapons of mass destruction and its financing;
- 2) The payment will not be received directly or indirectly by a sanctioned entity or person relating to the prevention, obstruction and cessation of the proliferation of weapons of mass destruction and its financing.

The Competent Authority shall, upon its decision to conduct the transaction, promptly notify the relevant UN Security Council Committee of its intention to permit the operation.

Article 6. Sanctions Violation/Compliance Monitoring

6.1. There are significant penalties for violating sanctions and any sanctions violation could result in serious reputational damage to the Company.

6.2. To ensure compliance with this Policy, the Company shall:

- a) Monitor economic trade sanctions regulations and update business information in the event of any material changes;
- b) Identify and approve controls to be followed;
- c) provide legal advice and guidance on specific situations upon request, including problem solving and inspections that raise concerns;

Article 7. Training

7.1. The Company ensures that employees of relevant C are aware of the sanctions compliance procedures that apply to them. Relevant employees are trained annually.

7.2. Given that the lists of sanctions targets change periodically, the Company Policy is reviewed annually to ensure that it remains relevant.

Article 8. Responsibilities of Company Employees

8.1. All employees are required to read and comply with this policy, understand and identify any red flags that may arise, and report potential sanctions compliance issues to the Director of the Company.

Article 9. List of restricted countries

8.1. High risk countries

Cuba (no EU sanctions; US: significant sanctions), Crimea, Iran (EU sanctions relaxed, significant US risks remain), North Korea (also known as DPRK or Democratic People's Republic of Korea), Sudan (North and South), Syria, Venezuela (US sanctions only)

8.2. Medium risk countries

Jurisdictions under enhanced monitoring (grey list) - <https://websfm.kz/fatf>

1. Bulgaria;
2. Burkina Faso;
3. Cameroon;
4. Croatia;
5. Democratic Republic of the Congo;
6. Haiti;
7. Monaco;
8. Mali;
9. Mozambique;
10. Nigeria;
11. Philippines;
12. South Africa;
13. Tanzania;
14. Vietnam;
15. Yemen;
16. Kenya;
17. Namibia;
18. Algeria;
19. Angola;
20. Ivory Coast;
21. Lebanon.

Assigns a medium risk category, whose country of registration is not the Republic of Kazakhstan or a high-risk jurisdiction/offshore/suspicious zone is assigned a medium risk category.

8.3. Low risk countries

A low risk category is assigned if the country of registration of which is the Republic of Kazakhstan or is not a jurisdiction/offshore/suspicious zone of high risk or medium risk, the LOW risk category is assigned

Article 10: Final provisions

10.1. This Policy applies only if it does not contradict the legislation of the Republic of Kazakhstan.

10.2. Changes and/or additions to the Policy may be made either by approving a new version of the Policy or by preparing text of changes and/or additions to the Policy.

10.3. Matters not regulated by these Policy shall be governed by the laws of the Republic of Kazakhstan, individual Provider internal documents and Provider regulations.

10.4. Changes and/or additions to the Policy may be made either by approving a new version of the Policy or by preparing text of changes and/or additions to the Policy. This Policy is effective as of July 13, 2023.