

# Prohibited Countries & Transactions

This document outlines the list of prohibited transactions and jurisdictions based on the AML/CFT framework of The Onegate Capital AG, the regulatory requirements, and international standards.

## Prohibited Countries

- |                            |                   |                      |                     |
|----------------------------|-------------------|----------------------|---------------------|
| • Afghanistan              | • Iran            | • North Korea        | • All disputed      |
| • Belarus                  | • Iraq            | • Russian Federation | territories such as |
| • Central African Republic | • Lebanon         | • Somalia            | Abhazia, Crimea,    |
| • Cuba                     | • Libya           | • South Sudan        | Donbas, Luhansk     |
| • Dem. Rep. of Congo       | • Mali            | • Syria              |                     |
| • Guinea-Bissau            | • Myanmar (Burma) | • Venezuela          |                     |
| • Haiti                    | • Nicaragua       | • Yemen              |                     |

## Prohibited Transactions

The Onegate Capital AG accounts must not be used to initiate transactions with the following characteristics:

- I. Payments that appear to relate to any form of illegal or unlawful activity, including, without limitation, money laundering, terrorist financing, human trafficking, political corruption, and illegal wildlife trafficking.
- II. Payments sanctioned by applicable law and regulations.
- III. Payments that do not appear to have a legitimate purpose, including, without limitation, commercial payments in repetitive, round amounts, and payments lacking transparency regarding the originator and beneficiary.
- IV. Payments that involve wholesale cash distribution, domestic and international banknote and coin services.
- V. Payments that involve the use of an Informal Value Transfer System.
- VI. Payments that appear to circumvent currency controls.
- VII. Payments related to Virtual Currency Administrators or Miners (that are your direct customers).
- VIII. Payments related to Virtual Currency Exchanges and/or Crypto asset Exchange Providers or Custodian Wallet Providers (that are your direct customers) and are not duly licensed or are not subject to regulatory AML program requirements or not domiciled in a Financial Action Task Force ("FATF") member country.
- IX. Payments involving unregulated/unlicensed Money Service Businesses, gambling, and gaming firms.
- X. Payments involving shell banks.
- XI. Payments associated with payable through accounts.
- XII. Payments involving third-party payment processors that resell their services to a third party (e.g., agent or provider of Independent Sales Organisation opportunities or gateway arrangements) or payments related to the provision of correspondent banking services to Financial Institutions (aka, nested/downstream correspondent banking services) not approved by The Onegate Capital AG.