

Anti-Money Laundering Compliance Program

1. Introduction

Paycific Limited LLC, a company with its registered address at 1001 S Main Street, STE 500, Kalispell, MT 59901, USA, State Registered number: C1630247 (hereinafter - **"Company"**, **"We"**, **"Our"** or **"Us"**), maintains an AML compliance framework designed to comply with the Bank Secrecy Act (hereinafter - **"BSA"**), applicable Financial Crimes Enforcement Network (hereinafter - **"FinCEN"**) regulations, and applicable United States (hereinafter - **"U.S."**) sanctions requirements.

This Anti-Money Laundering Compliance Program (hereinafter - **"Program"**) describes the standards, principles and commitments that the Company applies in order to fulfil its obligations under applicable law and to protect its services from being misused for illicit purposes.

This Program is provided for general informational purposes only and is intended as a summary of Our AML/CFT approach. More detailed operational requirements, internal controls, escalation measures, and recordkeeping arrangements are set out in the Company's internal AML framework and are applied through the Company's onboarding, compliance and operational processes.

2. Program Governance and Internal Controls

We maintain internal policies, procedures and controls designed to comply with applicable U.S. AML/CFT and sanctions requirements and to support the effective operation of its compliance framework.

As part of this framework, the Company designates a responsible BSA Compliance Officer, applies Customer identification and verification measures, performs sanctions and other relevant screening, monitors activity for unusual or suspicious behaviour, maintains required records, provides AML/CFT training to relevant personnel, and subjects its AML framework to periodic independent review.

The Company may also use approved third-party service providers to support certain elements of its Program. The use of such providers does not limit or replace Our responsibility for compliance with applicable law.

3. Customer Access, Identification and Verification

In order to access the Company's services, Customers may be required to complete identification, verification and screening measures in accordance with applicable U.S. AML/CFT and sanctions requirements and Our internal controls.

These measures help Us verify Customer identity, assess Customer risk, detect suspicious activity in a timely manner, prevent fraud and other misuse of its services, and support compliance with applicable legal and regulatory obligations.

The Company may require Customers to provide information and documentation, and may apply onboarding, verification and screening measures, before making services available. The scope of such measures may vary depending on the nature of the Customer, the requested service, the relevant risk profile, and applicable legal or regulatory requirements.

We may also request additional information or documentation, or apply additional review measures, where warranted by the circumstances of the case or by Our internal compliance framework.

4. Transaction Monitoring and Suspicious Activity Reporting

We maintain controls designed to detect unusual, suspicious or otherwise elevated-risk activity in connection with Our services.

Where activity gives rise to concern, it may be subject to further review and, where appropriate, escalation within the Company's AML/CFT framework. Transactions or activity that cannot be adequately assessed, or that present an unacceptable risk, may be held, paused, declined, restricted or otherwise not processed.

Where required or otherwise considered appropriate under applicable law and the Company's internal procedures, We may file a Suspicious Activity Report (hereinafter - "**SAR**") with FinCEN and may take any related follow-up action required under its AML/CFT framework.

5. Third-Party Providers

We may engage third-party service providers to support specific components of its AML/CFT compliance program, including, where relevant, identity verification, business verification, screening, transaction monitoring support, blockchain analytics, or recordkeeping-related support.

The Company applies appropriate selection, oversight and control measures in relation to such providers and remains responsible for the adequacy and effectiveness of its AML/CFT framework.

6. Prohibited Customers

The Company applies access restrictions in accordance with applicable law and its internal risk-based framework. Certain categories of Customers are prohibited and will not be accepted, or, where identified after onboarding, may be subject to restriction, suspension or termination of the business relationship.

Prohibited Customers may include, for example:

- persons or entities subject to applicable sanctions or connected with comprehensively sanctioned jurisdictions;

- persons or entities whose identity, ownership or control cannot be verified to Our satisfaction;
- persons or entities that refuse to provide information or documentation reasonably required by Us for due diligence or compliance purposes;
- persons or entities that We have reasonable grounds to believe are using, or intend to use, Our services for unlawful purposes; and
- persons or entities that otherwise fall within prohibited categories or outside Our internal risk appetite and Customer acceptance parameters.

7. Data Retention and Record Keeping

The Company collects, maintains and retains records in connection with its AML/CFT obligations under applicable U.S. law. This may include records relating to Customer identification and verification, due diligence, transactions, screening results, monitoring activity, SARs.

Records are retained for the periods required under applicable law and Our internal recordkeeping framework. In general, AML/CFT-related records are retained for a minimum period of five (5) years from the date of the termination of the Customer relationship.

The Company also maintains appropriate controls to preserve the confidentiality, integrity and accessibility of such records in accordance with its legal and compliance obligations.

8. Amendments to this Program

The Company regularly reviews its AML/CFT standards and may revise or supplement this Program from time to time to reflect changes in law, regulation, regulatory expectations, industry practice, business operations, or the Company's internal compliance framework.

9. Contacts

Questions, notices, requests, and other communications relating to this Program may be directed to the Company through the following contact details:

Company name: Paycific Limited LLC.

Registered address: 1001 S Main Street, STE 500, Kalispell, MT 59901, USA.

Website: <https://paycific.io/>

Email: support@paycific.io

The Company may update its contact details from time to time through the Website or by other electronic communication.