



## CUSTOMER ACCEPTANCE POLICY

### 1. INTRODUCTION

The Customer Acceptance Policy (CAP) of Niko Technologies OÜ (continue to be used “NT”) is an important document in determining the basis on which NT enters into relationships with its customers. An inadequate CAP or the inadequate implementation of the CAP can expose NT to serious compliance, legal and reputational risks.

High-risk accounts shall be subjected to intensify monitoring and enhanced due diligence. The Company shall set key indicators for such accounts, taking note of the background of the customer, such as the country of origin, sources of funds, the type of transactions involved and other risk factors.

Operating in the following high risk industries and regulated/registered by/in an EEA or a third equivalent country:

- Casinos;
- Betting houses;
- Gambling/Betting online related services;
- Financial or insurance services companies;
- Payment Institutions and Electronic Money Institutions (including MSBs providing Money Transmission Services and Currency Exchange Service);

NT requires legal licenses associated with type of business activity.

### 2. OBJECTIVES AND APPLICATION OF THE POLICY

NT will accept only those customers whose identity is established by conducting Due Diligence appropriate to the risk profile of the customer. Any transaction from a customer can be accepted only after Customer acceptance procedure is completed. NT shall only open an account once all the documents required to be submitted per the relevant category of customer has been duly submitted.

Collecting sufficient relevant information about the customer before the account relationship is established is the most effective defence against NT being used as the medium to launder the proceeds of crime or to finance terrorism.

NT should not enter into a business relationship or execute any transactions for Politically Exposed Person. (PEP) is defined by the Financial Action Task Force (FATF)



as an individual who is, or has been, entrusted with a prominent public function and can either be foreign or domestic, including their immediate family members and persons known to be their close associates.

### 3. RESTRICTED ACTIVITIES

3.1. NT does not provide account opening, payment services or any other products to the following customer groups:

3.2. Prohibition for business cooperation based on a geographical criterion.

3.3. US legal entities and legal entities, registered in countries under sanctions.

3.4. Prohibition for business cooperation based on business activities of the customer.

3.5. NT does not establish business relationships with entities which have registered as one of the activities and clients related to following activities:

- Trade of firearms/weapons (including pocket/pen knives), ammunitions, military arms, explosive devices, 3D Printers Specifically Designed to Create Firearms and firearm parts Firearms/Weapons;
- Illegal Adult Content (children / under-age people or depictions, rape, violence, torture or content that is abusive in nature, unconsciousness, altered mindstate or under mind control or manipulation, bestiality, incest);
- Escort agencies / prostitution / sexual services;
- Timeshare and timeshare maintenance;
- Illegal Drugs (Synthetic) including but not limited to K2, Spice, bath salts, synthetic cannabis, nitrate inhalers;
- Illegal Drugs (Herbal) including but not limited to kratom, salvia divinorum, kava & kava supplements, herbal incense, herbal smoking blends;
- Controlled Substances – scheduled, by prescription, or substances not yet assessed for classification, including stimulants, weight loss & performance enhancing, including but not limited to Miracle Cures, Peptides, Research Chemicals, Clenbuterol, poppers (amyl nitrite) etc.;
- Human Organs, Blood, or other tissues/fluid sales;
- Illegal products or services or any service providing peripheral support of illegal activities;
- Products, services, marketing or companies that promote hate, violence, discrimination, terrorism, harassment or abuse;
- Electronic and Surveillance Equipment: Jail Breaker Equipment/Software,



- Jamming Devices;
- Electronic Stores – Modification Chips;
  - Forex trading;
  - Extended Warranty Programs – Unregulated;
  - Explosives/Fireworks;
  - Counterfeit goods/replicas or other goods infringing intellectual property rights;
  - Live Animals;
  - Pyramid & Ponzi schemes;
  - Crowdfunding related to Real Estate or any type of Investment;
  - Pyrotechnic Devices/Supplies;
  - Hazardous Materials, Combustibles, Corrosives;
  - Products, services or media / marketing that may cause (or could reasonably result in) loss of health, quality of life or dignity to a person(s) or otherwise be harmful or incite bigotry, hatred or violence;
  - Unlicensed IPTV streaming services (unauthorised streaming);
  - Sale of products where Celebrity / well known faces and/or names are used (without permission);
  - Prescription medicines and pharmaceuticals, including prescription medical devices (e.g. medical contact lenses);

### 3.6. Prohibition for business cooperation based on other indicators

3.7. NT does not establish business relationships with entities or individuals of unknown identity or using fictitious or unreal names, or if there is reasonable doubt that the identification documents are falsified.

## 4. RESTRICTED COUNTRIES

According to CAP NT does not provide account opening, payment services or any other products to the entities, which are registered in the following jurisdictions:

- Marshall Island;
- Saint Vincent and the Grenadines;
- British Virgin Islands;
- Belize;
- Vanuatu;
- Seychelles;
- Mauritius;

- Dominica;
- Bahamas;
- Anguilla;
- Antigua and Barbuda;
- Afghanistan;
- Albania;
- American Samoa;
- Andorra;
- Armenia;
- Aruba;
- Bahrain;
- Barbados;
- Bermuda;
- Bosnia and Herzegovina;
- Botswana;
- Cabo Verde;
- Cayman Islands;
- Cook Islands;
- Curaçao;
- Ethiopia;
- Faroe Islands;
- Fiji;
- Former Yugoslav Republic of Macedonia;
- Grenada;
- Greenland;
- Guam;
- Guernsey;
- Guyana;
- Russia;
- Hong Kong SAR (*Special Administrative Region*);
- Isle of Man;
- Iran;
- Iraq;
- There is much more countries;



This list of above mentioned tax jurisdictions was created by Niko Technologies, based on European Union together with The Financial Action Task Force composed official document. This list (document) come to force on May 2018. It is important to mention, that this list is not an exhaustive list. The economic scale and geopolitics are constantly changing and it's the company's responsibility to act according the newest EU laws, directives and decisions.

The reference to the official page and list of Tax Haven countries by this date: <http://www.europarl.europa.eu/cmsdata/147404/7%20-%2001%20EPRS-Briefing-621872-Listing-tax-havens-by-the-EU-FINAL.PDF>

## 5. TERMINATION OF BUSINESS RELATIONSHIP

5.1. NT will terminate an established business relationship with the customer if there is a risk of money laundering and terrorism financing or a risk of any other regulatory sanction in relation to the relationship.

5.2. NT may terminate the account management agreement with immediate effect in cases of breach of contract, breach of other general terms and conditions, as well as for reasons indicating that account activity does not comply with the intent and purpose the customer gave when entering the business relationship, or for reasons of non-compliance with NT rules and regulations.