



## **CUSTOMER ACCEPTANCE POLICY**

### **1. INTRODUCTION**

The Customer Acceptance Policy (hereinafter the “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, in accordance with the principles and guidelines described in AML. An inadequate CAP or the inadequate implementation of the CAP can expose NT to serious compliance, legal and reputational risks.

### **2. OBJECTIVES AND APPLICATION OF THE POLICY**

This document aims to define the set of criteria that will serve as guidelines for the NT to accept or refuse a relation with potential Customers, to define criteria for a conditioned acceptance of Customers and to define criteria to assess the Customer’s risk level at the moment of the acceptance. Objectives are appended as under:

- to prevent illegal or criminal elements from using NT for money laundering activities;
- to enable NT to know/understand the customers and their financial dealings better to manage risks prudently ;
- to put in place appropriate controls for detection and reporting of suspicious activities and to comply with AML/CTF;

NT will accept only those customers whose identity is established by conducting Due Diligence appropriate to the risk profile of the customer. No account shall be opened in anonymous or fictitious names(s). NT shall only open an account once all the documents required to be submitted per the relevant category of customer has been duly submitted. No account shall be opened unless the prospective Client is approved by the Compliance Officer. Any transaction from a customer can be accepted only after the Customer acceptance procedure is completed.

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.

### **3. POLITICALLY EXPOSED PERSONS (PEPs)**

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.

Regardless of the PEP Identification process, which is specified in the NT’s AML Policy, applicable to this category of customers, the acceptance of a PEP as a customer of the Company always depends upon



the authorization to be granted by the individual responsible for the respective network with the highest hierarchical level (Compliance Officer).

#### 4. ACCEPTANCE REFUSAL REASONS

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

- that are under prohibition for business cooperation based on a geographical criterion;
- US legal entities and legal entities, registered in countries under sanctions;
- that are under prohibition for business cooperation based on business activities of the customer;
- people whose reputation in the media or in the market are usually associated with criminal activities;
- people whose activity or way of life make it difficult or impossible for NT to know the origin of their assets.

#### 5. RESTRICTED INDUSTRIES

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;



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- 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);

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.

## 6. RESTRICTED COUNTRIES

Following the latest revision, as at February 18, 2020, the EU blacklist comprises the following twelve jurisdictions: American Samoa, the Cayman Islands, Fiji, Guam, Oman, Palau, Panama, Samoa, Seychelles, Trinidad and Tobago, the US Virgin Islands and Vanuatu.

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 to the newest EU laws, directives, and decisions. Should you have any questions, please contact [compliance@niko-tech.eu](mailto:compliance@niko-tech.eu).

NT's service is not intended for use by or distribution to any individual or legal entity in any jurisdiction or country where such distribution, publication or use would be contrary to the law or regulatory provisions.

The reference to the official page and list of Tax Haven countries by this date:

[https://ec.europa.eu/taxation\\_customs/sites/taxation/files/eu\\_list\\_update\\_18\\_02\\_2020\\_en.pdf](https://ec.europa.eu/taxation_customs/sites/taxation/files/eu_list_update_18_02_2020_en.pdf)

FATF - Jurisdictions under Increased Monitoring – 21 February 2020

<https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/increased-monitoring-february-2020.html>

Specially Designated Nationals And Blocked Persons List (SDN) Human Readable Lists:

<https://www.treasury.gov/resource-center/sanctions/sdn-list/pages/default.aspx>

Sanctions List Search application (OFAC):

<https://sanctionssearch.ofac.treas.gov/>

## 7. TERMINATION OF BUSINESS RELATIONSHIP

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.

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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.