



Citfin Risk Appetite Statement

**pertaining to Anti-Money
Laundering**



Citfin Risk Appetite Statement pertaining to Anti-Money Laundering

Citfin is committed to combating financial crime and ensuring that accounts held at our firm are not misused for the purpose of money laundering or terrorism financing. Citfin does not accept nor tolerate any knowing or willfully negligent involvement in or association with Money Laundering, Bribery and Corruption, or non-adherence to Sanctions & Embargoes, nor the non-compliance with related rules, regulations, laws, and policies.

Bellow, we have outlined standards that describe how we review our clients, the nature of their flows, our clients' customers, and the strength of their Financial Crime Programs and systems. As we continue to strengthen our Program, we have enhanced our AML Risk Appetite Statement.

Citfin reserves the right to reject any client, payment, or business that is not consistent with our stated Risk Appetite.

I. Adherence to Applicable Laws and Regulations

We expect to have policies, procedures and AML, Sanctions, Anti-Bribery & Corruption and Anti-Fraud Programs that comply with applicable laws and regulations in our jurisdiction and the currencies in which we transact.

In accordance with funds transfer regulations or equivalent regulations in the jurisdictions in which we operate, we are required to collect and to provide accurate and complete information regarding the payers and payees of each payment order or other transaction processed through our accounts. We must also provide, if requested by our correspondent or regulator of any legal government party, additional information regarding a payment order or other transaction, or a customer who is a party to such transaction.

II. Monitoring for Suspicious Activity

We have AML, Sanctions and Anti-Bribery & Corruption and Anti-Fraud Programs that include customer due diligence, enhanced due diligence, and automated suspicious and prohibited transaction monitoring and reporting policies as well as surveillance systems to monitor such activity.

We also declare that our organization's AML, Sanctions and Anti-Bribery & Corruption and Anti-Fraud Programs and controls will allow us to respond to field inquiries and due diligence requests that we may receive in relation to payments through our accounts.

III. Prohibitions

We will not knowingly offer products or services to clients or to parties who engage in money laundering, terrorist financing, support parties or regimes subject to governmental sanctions as prohibited by law or by Special Risk Country restrictions or use Citfin services to facilitate illegal activities including bribery, corruption, or tax evasion (collectively "illicit activities").

We have no appetite to establish nor actively operate a client relationship for an entity which:

- (a) We have strong reason to believe will use Citfin's products and services for illicit activities or pose a significant risk to Citfin's reputation due to the client's real or perceived association with illicit activities.
- (b) We are unable to determine or verify the identity or ownership information, including the nature of the client's business and the source of their wealth or funds, necessary to provide Citfin sufficient clarity to assess the financial crime risks presented by the relationship, or otherwise required by regulatory requirements.

Citfin will not establish nor maintain a client relationship with an entity or individual that operates in a prohibited high-risk industry that exposes Citfin to heightened financial crime risk and reputational risk.

We intend to conduct business only with reputable clients who use their own products, services, and related accounts for legitimate purposes, and whose identities can be determined and verified, and are responsive when concerns are identified in relation to financial crime related issues. In keeping with that principle, we will not knowingly conduct business with clients that seek to process payments through Citfin involving:

- Illegal or Illicit Activity, specifically
- Dealers involved in the distribution of Arms and Munitions
- Narcotics including Cannabis Industry
- Human Trafficking
- Unregulated Gambling
- Red light businesses/Adult Entertainment
- Terrorism & Terrorist related financing
- Also, we will not knowingly conduct business with clients who deals with Virtual Currencies – Private Currency Exchange

IV. Sanctions Risk Appetite

We have no appetite for establishing or maintaining a client relationship with an entity or individual designated on the UN, EU, OFAC or where otherwise prohibited by applicable law or regulation. We also have no appetite to execute transactions or otherwise cooperate with any parties included on the UN, EU, OFAC as well as other local sanctions lists. We will not deal with Sectoral Sanctioned Parties where to do so would result in a breach of applicable Sectoral Sanctions.

We have no appetite to establish nor actively operate a client relationship or execute transactions or cooperate with parties in a jurisdiction where to do so would contravene local sanctions or embargoes regulations or anti-boycott regulations.

Neither Citfin, nor its clients nor parties to a transaction will remove or alter payment information which has the effect of disguising the identity of parties or of other information required under any applicable Sanctions and Embargoes regulations.

Special Risk Countries (SRCs) – Prohibited

- Afghanistan
- Cuba
- Iran
- Democratic People’s Republic of Korea (North Korea)
- Republic of Sudan
- Republic of South Sudan
- Syria
- Crimean Region of Ukraine