

AML & KYC Notice

NEMOPAY GLOBAL CORP.

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3.1 Our Regulatory Obligations

NEMOPAY GLOBAL CORP. (“NEMOPAY”) is a Money Services Business registered with the Financial Transactions and Reports Analysis Centre of Canada (“FINTRAC”), MSB Registration No. C100001197. As a registered MSB, NEMOPAY is subject to the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (“PCMLTFA”) and its regulations. NEMOPAY is also registered with the Bank of Canada as a payment service provider under the Retail Payment Activities Act (“RPAA”).

NEMOPAY maintains a risk-based compliance program to detect and deter money laundering, terrorist financing and sanctions evasion. NEMOPAY’s Head of Compliance and Money

Laundering Reporting Officer is responsible for the compliance program. The program is reviewed for effectiveness at least every two years by a reviewer who is not involved in running it.

This notice explains what NEMOPAY asks of clients and why. It applies to both of NEMOPAY's services: cross-border business payments and the sale of USDT (TRC20), described in the Terms & Conditions.

3.2 Who We Serve

NEMOPAY serves businesses, and individuals acting for business or professional purposes, such as sole traders and freelancers. NEMOPAY does not serve consumers acting for personal purposes. Clients must be established or resident in Canada, excluding Quebec, or in the European Union or European Economic Area. Services are not offered to persons in the United Kingdom.

NEMOPAY does not serve clients connected with Russia, Belarus, the regions of Ukraine under Russian occupation or control, jurisdictions subject to comprehensive sanctions, or jurisdictions subject to a call for action by the Financial Action Task Force ("FATF"). Clients connected with jurisdictions under increased monitoring by the FATF, or on the European Union list of high-risk third countries, are accepted only after enhanced due diligence and approval by the Head of Compliance.

NEMOPAY does not accept cash. NEMOPAY does not rely on introducers or other third parties to identify its clients.

3.3 Client Identification

NEMOPAY verifies the identity of every client before providing any service, using the methods permitted under Canadian law.

Individual clients (sole traders and freelancers). NEMOPAY verifies your identity and obtains your name, address, date of birth and occupation or business activity. You must also evidence your business activity, for example by business registration, a business website, contracts or invoices.

Business clients. NEMOPAY confirms the existence of the business and obtains its name, address, registration details and the names of its directors. NEMOPAY also verifies the identity of the individuals who act for the business and confirms their authority to do so.

The documents and information required are communicated to you during onboarding.

3.4 Beneficial Ownership

For business clients, NEMOPAY obtains the names and addresses of all individuals who directly or indirectly own or control 25% or more of the business, and information on its ownership, control and structure. NEMOPAY takes reasonable measures to confirm the accuracy of this information. Where this information cannot be obtained or its accuracy cannot be confirmed, NEMOPAY takes reasonable measures to verify the identity of the most senior managing officer of the business and treats the client as high risk.

Business clients must tell NEMOPAY promptly of any change in ownership or control.

3.5 Purpose of the Relationship and Expected Activity

At onboarding NEMOPAY records the purpose and intended nature of the business relationship, including your business activity, expected payment volumes and values, expected beneficiaries and their countries, the currencies you will use and, for USDT sales, the wallets you will use. NEMOPAY uses this profile to review your payments and USDT sales.

3.6 Customer Due Diligence and Enhanced Due Diligence

NEMOPAY assigns each client a risk rating at onboarding and keeps it under review. Enhanced due diligence applies to higher-risk clients, including clients with complex ownership structures, clients connected with higher-risk jurisdictions, clients in higher-risk business activities and domestic politically exposed persons. Enhanced due diligence may involve additional documents, verification of source of funds and source of wealth, approval by the Head of Compliance or the Director, and more frequent review.

3.7 Politically Exposed Persons and Heads of International Organizations

NEMOPAY asks every client to declare whether it, or any of its directors or beneficial owners, is a politically exposed person (“PEP”), a head of an international organization (“HIO”), or a family member or close associate of one, and checks this through screening.

NEMOPAY does not currently accept clients who are foreign PEPs or HIOs, or their family members or close associates, or business clients owned or controlled by such persons. Domestic PEPs are considered case by case, with enhanced due diligence and the approval of the Director.

NEMOPAY also takes reasonable measures to determine whether a person is a PEP, an HIO, or a family member or close associate of one, when an international electronic funds transfer or virtual currency transfer of CAD 100,000 or more is requested or received.

3.8 Sanctions Screening

NEMOPAY screens clients, directors, beneficial owners, authorized persons and beneficiaries, at onboarding, before each payment or USDT transfer and when the lists change. NEMOPAY screens against:

- Canadian sanctions and listed persons, including those under the Special Economic Measures Act, the Justice for Victims of Corrupt Foreign Officials Act (Sergei Magnitsky Law), the United Nations Act regulations, the Regulations Implementing the United Nations Resolutions on the Suppression of Terrorism, and the entities listed under the Criminal Code;

- United Nations Security Council sanctions lists;

- European Union sanctions lists;

- United Kingdom sanctions lists; and

- United States sanctions lists administered by the Office of Foreign Assets Control (“OFAC”).

NEMOPAY also treats as sanctioned any entity owned or controlled by a listed person. Before every USDT transfer, NEMOPAY screens the destination wallet using blockchain analytics covering the TRON network.

NEMOPAY applies foreign sanctions lists as a risk management measure and in a manner consistent with Canadian law. NEMOPAY does not provide services to, or process transactions involving, sanctioned persons or prohibited jurisdictions. Where a match to a Canadian list is confirmed, NEMOPAY freezes the property concerned and reports as Canadian law requires.

NEMOPAY applies the Ministerial directives issued under the PCMLTFA concerning Iran, the Democratic People's Republic of Korea and Russia. Transactions involving Iran are reported to FINTRAC as the Iran directive requires.

3.9 Source of Funds and Source of Wealth

NEMOPAY may ask for information and documents about the source of the funds used for a payment or a USDT purchase and, for higher-risk clients, the source of wealth of the client or its beneficial owners. Funds must come from a bank account in the client's own name. This is a standard requirement under Canadian anti-money laundering law and does not imply wrongdoing.

3.10 Transaction Review and Ongoing Monitoring

NEMOPAY reviews every payment and every USDT sale before it is executed, against your profile, the supporting documents provided and known indicators of money laundering, terrorist financing and sanctions evasion. NEMOPAY also monitors each business relationship over time and updates client information periodically, more often for higher-risk clients.

Unusual activity may lead to requests for more information, a delay to a payment within the two-business-day limit set in the Terms & Conditions, a declined payment with the funds returned to the bank account they came from, a declined USDT sale, or the end of the business relationship.

3.11 Regulatory Reporting

As required by Canadian law, NEMOPAY files the following reports:

Suspicious Transaction Reports (STRs): to FINTRAC, as soon as practicable, where there are reasonable grounds to suspect that a transaction or attempted transaction is related to the commission or attempted commission of a money laundering offence, a terrorist activity financing offence or a sanctions evasion offence. There is no minimum amount.

Listed Person or Entity Property Reports (LPEPRs): to FINTRAC immediately, with disclosure to the Royal Canadian Mounted Police and the Canadian Security Intelligence Service, where NEMOPAY has in its possession or control property that it knows is owned or controlled by or on behalf of a listed terrorist group or a listed or sanctioned person or entity.

Electronic Funds Transfer Reports (EFTRs): to FINTRAC within five working days, for international electronic funds transfers of CAD 10,000 or more that NEMOPAY

initiates or finally receives, whether in a single transaction or in several transactions by or on behalf of the same person or entity within 24 consecutive hours.

Large Virtual Currency Transaction Reports (LVCTRs): to FINTRAC within five working days, where NEMOPAY receives virtual currency equivalent to CAD 10,000 or more, in a single transaction or in several transactions within 24 consecutive hours. NEMOPAY does not receive virtual currency from clients; this report may apply to NEMOPAY's purchases of its own USDT inventory.

Reports under Ministerial directives: transactions covered by a Ministerial directive are reported as the directive requires.

The law restricts what NEMOPAY may disclose about these reports. NEMOPAY does not tell anyone whether a report has been made or is being considered.

3.12 Travel Rule

Canadian law requires certain information to travel with payments and virtual currency transfers.

Electronic funds transfers. For every electronic funds transfer of CAD 1,000 or more that NEMOPAY initiates, whether international or domestic, NEMOPAY includes with the transfer the name, address and account number of the client who requested it and the name, address and account number of the beneficiary. In practice, NEMOPAY includes this information with every payment it sends, whatever the amount. For transfers NEMOPAY receives, it takes reasonable measures to confirm that the required information is included and, where it is missing, decides whether to obtain it, delay the payment within the two-business-day limit, or decline and return the funds.

Virtual currency transfers. For every USDT transfer NEMOPAY sends, whatever the amount, NEMOPAY collects and records the name, address and account number or other reference number of the client who requested the transfer and the name, address and wallet address or account number of the beneficiary. Where the beneficiary is at a virtual asset service provider, NEMOPAY transmits this information to that provider with the transfer. Where USDT is sent to a client's own wallet, NEMOPAY records the information and verifies, before the first transfer, that the client owns the wallet. NEMOPAY does not send USDT to wallets of third parties that are not with a licensed virtual asset service provider.

NEMOPAY is registered with FINTRAC as a Money Services Business dealing in virtual currencies. All of NEMOPAY's anti-money laundering obligations apply to its USDT sales.

3.13 Record Keeping

NEMOPAY keeps the records required by Canadian anti-money laundering law for at least five years, and produces them to FINTRAC within 30 days of a request. Client identification and business relationship records are kept for at least five years after the end of the business relationship. Payment and transfer records are kept for at least five years from the date they were created.

3.14 Client Cooperation

Clients must:

Provide complete, accurate and current information at onboarding and throughout the business relationship.

Tell NEMOPAY promptly of any material change in corporate structure, ownership, business activity, address or other information provided.

Provide supporting documents for payments and answer reasonable compliance and information requests, including requests that NEMOPAY receives from its banking partner.

Not provide false, misleading or incomplete information.

Failure to cooperate may result in a delayed or declined payment, a declined USDT sale, or the end of the business relationship.

3.15 Contact

Field	Value
AML/KYC and compliance matters	compliance@nemopay.io
Address	NEMOPAY GLOBAL CORP., 1100 W 73rd Ave, Vancouver, BC V6P 6G5, Canada