

**RULES OF PROCEDURE  
FOR PREVENTION OF MONEY LAUNDERING AND TERRORIST  
FINANCING AND  
COMPLIANCE WITH INTERNATIONAL SANCTIONS**

Established by the decision of the management board of  
**PrivaXchange OÜ, registry code 14409336**, (hereinafter **Provider  
of service**) on 24.03.2021.

## 1. General provisions

1.1. These rules of procedure for prevention of money laundering and terrorist financing, and compliance with international sanctions (hereinafter **Rules**) lay down requirements for screening the Clients (as defined in section 2.7) in order to prevent entering into deals involving suspected Money Laundering and Terrorist Financing, and to ensure identification and reporting of such.

1.2. The obligation to observe the Rules rests with Management Board members and employees of the Provider of service, including temporary staff, agents of the Provider of service who initiate or establish Business Relationship (as defined in section 2.6) (hereinafter all together called the **Representative**). Every Representative must confirm awareness of the Rules with the signature.

1.3. The Rules are primarily based on the regulations of Money Laundering and Terrorist Financing Prevention Act (hereinafter **the Act**) and International Sanctions Act (hereinafter **ISA**).

## 2. Definitions

2.1. Money Laundering – is a set of activities with the property derived from criminal activity or property obtained instead of such property with the purpose to:

- i. conceal or disguise the true nature, source, location, disposition, movement, right of ownership or other rights related to such property;
- ii. convert, transfer, acquire, possess or use such property for the purpose of concealing or disguising the illicit origin of property or of assisting a person who is involved in criminal activity to evade the legal consequences of his or her action;
- iii. participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions referred to subsections 2.1.i and 2.1.ii.

- 2.2. Terrorist Financing – acts of financing of terrorism as defined in § 237<sup>3</sup> of the Penal Code of Estonia.

- 2.3. International Sanctions – list of non-military measures decided by the European Union, the United

Nations, another international organisation or the government of the Republic of Estonia and aimed to maintain or restore peace, prevent conflicts and

restore international security, support and reinforce democracy, follow the rule of law, human rights and international law and achieve other objectives of the common foreign and security policy of the European Union.

2.4. Compliance Officer or CO – representative appointed by the Management Board responsible for the effectiveness of the Rules, conducting compliance over the adherence to the Rules and serving as contact person of the FIU.

2.5. FIU - Financial Intelligence Unit of the Police and Border Guard Board of Estonia.

2.6. Business Relationship – a relationship of the Provider of service established in its economic and professional activities with the Client.

2.7. Client – a natural or legal person, who uses services of the Provider of service.

2.8. Beneficial Owner – is a natural person, who:

i. Taking advantage of his influence, exercises control over a transaction, operation or another person and in whose interests or favour or on whose account a transaction or operation is performed taking advantage of his influence, makes a transaction, act, action, operation or step or otherwise exercises control over a transaction, act, action, operation or step or over another person and in whose interests or favour or on whose account a transaction or act, action, operation or step is made.

ii. Ultimately owns or controls a legal person through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that person, including through bearer shareholdings, or through control via other means. Direct ownership is a manner of exercising control whereby a natural person holds a shareholding of 25 per cent plus one share or an ownership interest of more than 25 per cent in a company. Indirect ownership is a manner of exercising control whereby a company which is under the control of a natural person holds or multiple companies which are under the control of the same natural person hold a shareholding of 25 per cent plus one share or an ownership interest of more than 25 per cent in a company.

iii. Holds the position of a senior managing official, if, after all possible means of identification have been exhausted, the person specified in clause ii cannot be identified and there is no doubt that such person exists or where there are doubts as to whether the identified person is a beneficial owner.

iv. In the case of a trust, civil law partnership, community or legal arrangement, the beneficial owner is the natural person who ultimately controls the association via direct or indirect ownership or otherwise and is such associations': settlor or person who has handed over property to the asset pool, trustee or manager or possessor of the property, person ensuring and controlling the preservation of property, where such person has been appointed, or the beneficiary, or where the beneficiary or beneficiaries have yet to be determined, the class of persons in whose main interest such association is set up or operates.

2.9. Politically Exposed Person or PEP - is a natural person who is or who has been entrusted with prominent public functions including a head of state, head of government, minister and deputy or assistant minister; a member of parliament or of a similar legislative body, a member of a governing body of a political party, a member of a supreme court, a member of a court of auditors or of the board of a central bank; an

ambassador, a chargé d'affaires and a high-ranking officer in the armed forces; a member of an administrative, management or supervisory body of a state-owned enterprise; a director, deputy director and member of the board or equivalent function of an international organisation, except middle-ranking or more junior officials.

2.9.1. The provisions set out above also include positions in the European Union and in other international organizations.

2.9.2. A family member of a person performing prominent public functions is the spouse, or a person considered to be equivalent to a spouse, of a politically exposed person; a child and their spouse, or a person considered to be equivalent to a spouse, of a politically exposed person; a parent of a politically exposed person.

2.9.3. A close associate of a person performing prominent public functions is a natural person who is known to be the beneficial owner or to have joint beneficial ownership of a legal person or a legal arrangement, or any other close business relations, with a politically exposed person; and a natural person who has sole beneficial ownership of a legal entity or legal arrangement which is known to have been set up for the de facto benefit of a politically exposed person.

2.10. Local Politically Exposed Person or local PEP – a natural person, provided in section 2.9, who performs or has performed prominent public functions in Estonia, a contracting state of the European Economic Area or in an institution of European Union.

- 2.11. Provider of service – **PrivaXchange OÜ**
- 2.12. Management Board or MB – management board of the Provider of service. Member of the MB, as

appointed by relevant MB decision, is responsible for implementation of the Rules.

2.13. Equivalent Third Country – means a country not a Member State of European Economic Area but applying an equivalent regime to the European Union corresponding (AML) framework (see also Exhibit 1). 2.14. Virtual currency -

### **3. Description of activities of the Provider of service**

3.1. The Provider of service is the provider of a virtual currency wallet service in the framework of which the Provider of service provides hot and cold wallets for clients where funds are transferred and can be used for the purpose of keeping and storing virtual currencies.

3.2. The Provider of service is a subject to authorisation by the FIU.

### **4. Compliance Officer**

- 4.1. The MB shall appoint a CO whose principal tasks are to:
  - 4.1.1. monitor the compliance of the Rules with the relevant laws and compliance of the activity of the Representatives with the procedures established by the Rules;
  - 4.1.2. compile and keep updated the data regarding countries with low tax risk, high and low risk of Money Laundering and Terrorist Financing and economical activities with great exposure to Money Laundering and Terrorist Financing;
  - 4.1.3. carry out training, instruct and update the Representatives on matters pertaining to procedures for prevention of Money Laundering and Terrorist Financing;
  - 4.1.4. report to the MB once a year (or more frequently, if necessary) on compliance with the Rules, and on circumstances with a suspicion of Money Laundering or Terrorist Financing;
  - 4.1.5. collect, process and analyse the data received from the Representatives or Clients concerning suspicious and unusual activities;
  - 4.1.6. collaborate with and report to the FIU on events of suspected Money Laundering or Terrorist Financing, and respond to enquiries of the FIU;
  - 4.1.7. make proposals on remedying any deficiencies identified in the course of checks.
  
- 4.2. The CO must meet all the requirements, prescribed by the Act, and appointment of the CO shall be

co-ordinated with the FIU. If, as a result of a background check carried out by the FIU, it becomes evident that the CO's credibility is under suspicion due to their previous acts or omissions, the Provider of service may extraordinarily terminate the CO's employment contract due to the loss of credibility.

4.3. Tasks of the CO can be performed by a department, therefore provisions of section 4.2 will apply accordingly.

## **5. Application of due diligence measures**

5.1. The Provider of service shall determine and take due diligence (hereinafter **DD**) measures using results of conducted risk assessment (see Section 10), and provisions of national risk assessment, published on the web-page of the Ministry of Finance of Estonia.

5.2. The Representatives shall pay special attention to circumstances that refer to Money Laundering or Terrorist Financing.

5.3. Depending on the level of the risk of the Client and depending on the fact whether the Business Relationship is an existing one or it is about to be established, the Provider of service shall apply either normal DD measures (see Section 6), simplified DD measures (see Section 8) or enhanced DD measures (see Section 9). The Provider of service shall also apply continuous DD measures to ensure ongoing monitoring of Business Relationships (see Sections 5.7-5.10).

- 5.4. DD measures shall include the following procedures:
  - i. Identifying the Client and verifying its identity using reliable, independent sources, documents or data, including e-identifying;
  - ii. Identifying and verifying of the representative of the Client and the right of representation;
  - iii. Identifying the Client's Beneficial Owner;
  - iv. Assessing and, as appropriate, obtaining information on the purpose of the Business Relationship;
  - v. Conducting ongoing DD on the Client's business to ensure the Provider of service's knowledge of the Client and its source of funds is correct;
  - vi. Obtaining information whether the Client is a PEP or PEP's family member or PEP's close associate.
- 5.5. The Provider of service shall establish the source of wealth of the Client, where appropriate.
- 5.6. To comply with the DD obligation, the Representatives shall have the right and obligation to:
  - i. request appropriate identity documents to identify the Client and its

representatives;

ii. request documents and information regarding the activities of the Client and legal origin of funds;

iii. request information about Beneficial Owners of a legal person;

iv. screen the risk profile of the Client, select the appropriate DD measures, assess the risk

whether the Client is or may become involved in Money Laundering or Terrorist Financing; v. re-identify the Client or the representative of the Client, if there are any doubts regarding the correctness of the information received in the course of initial identification;

- 5.7. The objective of the continuously applied DD measures is to ensure on-going monitoring of Clients.

Conducting ongoing monitoring of the Business Relationship includes:

- i. Keeping up-to-date the documents, data or information, obtained during taking DD measures;
- ii. Paying particular attention Client's conduction, leading to criminal activity or Money Laundering or Terrorist Financing;
- iii. Paying particular attention to the Business Relationship, if the Client is from or the seat of a Client being a legal person is located in a third country, which is included in the list of risk countries (see Exhibit 1).

5.8. Annual review of a Client being a legal entity is carried out regularly once a year. Updated data shall be recorded in the Provider of service's Client database.

5.9. The Representative updates the data of a Client, who is either a legal person or a natural person, i.e. takes appropriate DD measures every time when:

- i. the Client addresses the Provider of service with the request to amend a long-term contract during the term of its validity;
- ii. upon identification and verification of the information there is reason to suspect that the documents or data gathered earlier are insufficient, have changed or are incorrect. In this case, the Representative may conduct a face-to-face meeting with the Client;

- iii. the Provider of service has learned through third persons or the media that the activities or data of the Client have changed significantly.

5.10. The Representative shall evaluate the substance and the purpose of the Client's activities, in order to establish the possible links with Money Laundering or Terrorist Financing. The evaluation should result in an understanding about the purpose of the Business Relationship for the Client, the nature of the Client's business, the risk levels of the Client and, if necessary, the sources of funds.

## **6. Normal due diligence measures**

6.1. The Provider of service shall conduct normal DD in the following cases: i. Upon establishing a new Business Relationship;

ii. In the event of insufficiency or suspected incorrectness of the documents or information gathered previously in the course of carrying out DD measures;

iii. Upon suspicion of Money Laundering or Terrorist Financing.

### **6.2. In the course of conducting normal DD measures, the Representative shall apply the measures of DD as provided for in section 5.4.**

6.3. No new Business Relationship can be formed, if the Client, in spite of the respective request, has failed to present documents and appropriate information required to conduct DD, or if based on the presented documents, the Representative suspects Money Laundering or Terrorist Financing.

6.4. If in spite of the respective request an existing Client has failed to present during the contract period documents and appropriate information required to conduct DD, such behaviour constitutes material breach of contract that shall be reported by the Representative to the CO, and in such case the contract(s) concluded with the Client shall be cancelled and the Business Relationship shall be terminated as soon as feasible<sup>1</sup>. 6.5. The Provider of service shall not enter into Business Relationships with anonymous Clients.

## **7. Identification of a person**

- 7.1. Upon implementing DD measures the following person shall be identified:
  - i. Client – a natural or legal person;
  - ii. Representative of the Client – an individual who is authorized to act on behalf of the Client;
  - iii. Beneficial Owner of the Client;
  - iv. PEP – if the PEP is the Client or a person connected with the Client (see Section 2.9).



- **7.2. Upon establishing the relationship with the Client the Provider of service shall identify and**

**verify the Client while being present at the same place as the Client or by using information technology means.**

7.3. For identification of a Client and verification of the identity of a Client by using information technology means, the Provider of service shall use:

7.3.1. a document issued by the Republic of Estonia for the purpose of digital identification; 7.3.2. another electronic identification system within the meaning of the Regulation (EU) No 910/2014 of the European Parliament and of the Council<sup>2</sup>. If the Client is a foreign national, the identity document issued by the competent authority of the foreign country is also used

simultaneously.

7.4. In case of identification of a Client and verification of the identity of a Client by using information technology means the Provider of service shall additionally obtain data from a reliable and independent source, e.g. identity documents databases.

- 7.5. Identification of a Client being a natural person and a representative of a Client who is a legal person
  - 7.5.1. Upon establishing a Business Relationship, identification takes place, above all, during a face- to-face meeting or by using information technology means.
  - 7.5.2. The Rules must be considered when dealing with the documents that can be used to identify the Client or its representative and the requirements established for them (see Section 7.10). If it is not possible to obtain original documents for identification of a Client, request documents certified or authenticated by a notary public or authenticated officially for verification of the identity of the natural person, or use data obtained from other reliable and independent sources (including electronical identification) on condition that information is obtained from at least two different sources.
  - 7.5.3. Verification must be made whether or not such person is a PEP (see Section 7.9).
  - 7.5.4. A new Client and, if necessary, an existing Client shall confirm the correctness of the submitted information and data by signing the Client data registration sheet (see Form 1).
- 7.6. Identification of a Client being a legal person
  - 7.6.1. To identify a Client who is a legal person, the Representative shall take the following actions: i. Check the information concerning a legal person by accessing the relevant electronic databases (e-commercial register/ e-äriregister and European Business Register);

- ii. If it is not possible to obtain an original extract from the register or the respective data, request documents (extract from the relevant registry, certificate of registration or equivalent document) certified or authenticated by a notary public or authenticated officially for verification of the identity of the legal person, or use data obtained from other reliable and independent sources (including electronical identification) on condition that information is obtained from at least two different sources;
- iii. Ask the representative of a foreign legal person to present an identity documents and a document evidencing of his/her power of attorney, which has been notarised or

<sup>1</sup> The termination of the long-term contract or contract without the term must foresee the Provider of service's right to terminate the contract extraordinarily without observing the period of pre-notice in case the Client does not provide requested identification or verification documents (in due time)

<sup>2</sup><http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1510127223064&uri=CELEX:32014R0910>

authenticated pursuant to an equal procedure and legalised or authenticated by a certificate substituting for legalisation (apostille), unless otherwise prescribed by an international agreement;

- iv. On the basis of the information received from the representative of the foreign legal person, control whether or not the legal person could be linked with a PEP (see Section 7.9);
- v. If the seat of a Client being a legal person is located in a third country, which is included in the list of risk countries (see Exhibit 1), report this to the CO, who shall decide the additional measures to be applied to identifying and background checking of the person.

7.6.2. The document presented for identification of a legal person shall set out at least the

following:

- i. business name, registry code (number), date of registration, seat and address;
- ii. names and authorisations of members of the Management Board or the head of branch or the other relevant body.

7.6.3. A legal representative of a new Client (subsequently as required) shall confirm the correctness of the submitted information and data by signing the Client data registration sheet (see Form 1).

7.7. Consequences of insufficient identification of a Client

7.7.1. Should the Representative establish that the identification of a Client is insufficient the

Representative shall:

- i. Promptly apply the enhanced DD measures pursuant to the Rules;
- ii. Notify the CO of the failure to implement normal DD in a timely manner;
- iii. Assess the risk profile of the Client and notify CO and/or MB for the purposes of the provisions in Section 12.3.

7.8. Identification of the Beneficial Owner of the Client

7.8.1. Registration and assessment of the Beneficial Owner(s) of a legal person is mandatory. 7.8.2. There is no need to identify the Beneficial Owners of a Client/company whose securities have

been accepted for trading on a regulated securities market.

7.8.3. In order to establish the Beneficial Owner, the Representative shall take the following

**actions:**

Gather information about the ownership and control structure of the Client on the basis of information provided in pre-contractual negotiations or obtained from another reliable and independent source;

In situations, where no single person holds the interest or ascertained level of control to the extent of no less than 25 per cent (see Section 2.9), apply the principle of proportionality to establishing the circle of beneficiaries, which means asking information about persons, who control the operations of the legal person, or otherwise exercise dominant influence over the same;

If the documents used to identify a legal person, or other submitted documents do not clearly identify the Beneficial Owners, record the respective information (i.e. whether the legal person is a part of a group, and the identifiable ownership and management structure of the group) on the basis of the statements made by the representative of the legal person, or a written document under the hand of the representative;

To verify the presented information, make enquiries to the respective registers, and request an annual report or another appropriate document to be presented.

If no natural person is identifiable who ultimately owns or exerts control over a Client and all other means of identification are exhausted, the senior managing official(s) might be considered to be the Beneficial Owner(s).

format reproducible in writing from a credit institution registered in the Estonian commercial register or from the branch of a foreign credit institution,

or from a credit institution that has been registered or whose place of business is in a contracting state of the European Economic Area or an Equivalent Third Country (see Exhibit 1).

## 7.9. Identification of Politically Exposed Person

7.9.1. The Representative shall implement the following measures to establish whether or not a

person is a PEP:

i. asking the Client to provide necessary information;

ii. making an enquiry or checking the data on websites of the respective supervisory authorities or institutions of the country of location of the Client.

7.9.2. The matter of whether to establish a Business Relationships with a PEP, or a person associated with him or her, and the DD measures applied to such person shall be decided by the MB.

7.9.3. If a Business Relationship has been established with a Client, and the Client or its Beneficial Owner subsequently turns out to be or becomes a PEP, CO and MB shall be notified of that.

7.9.4. In order to establish a Business Relationship with a PEP or a company connected with that

i. ii. iii.

person, it is necessary to:

take enhanced DD measures (see Section 9);

establish the source of wealth of this person;

monitor the Business Relationship on a continual basis.

7.9.5. DD measures, mentioned in Section 7.9.4 might be not applicable regarding local PEPs, if there are no relevant circumstances, leading to the higher risks.

7.9.6. Respective remark must be made in the Provider of service's database of Clients on documents of such person in the form of notation "Politically Exposed Person".

## 7.10. Documents that can be used for identification

7.10.1. In case of Clients being natural persons and the representatives of Clients, the following

documents can be used for identification<sup>3</sup>:

i. Personal ID card (whether ID card, e-resident card or residence permit card);

ii. Passport or diplomatic passport;

iii. Travel document issued in a foreign country;

vi. Driving licence (if it has name, facial image, signature and personal code or date of birth of holder on it).

7.10.2. The Representative shall make a copy of the page of identity document which contains personal data and photo.

7.10.3. In addition to an identity document, the representative of a Client shall submit a document in the required format certifying the right of representation.

7.10.4. Legal person and its passive legal capacity shall be identified and verified on the basis of the

following documents:

in case of legal persons registered in Estonia and branches of foreign companies registered in Estonia, the identification shall be conducted on the basis of an extract of a registry card of commercial register; foreign legal persons shall be identified on the basis of an extract of the relevant register or a transcript of the registration certificate or an equal document, which has been issued by competent authority or body not earlier than six months before submission thereof.

7.10.5. If not original documents are used for identification, the Representative shall control and verify data by using at least two reliable and independent sources.

- 7.11. If the Client is a natural person, the following data shall be recorded:
  - i. Name of the Client;
  - ii. Personal identification code (in case of absence the date and place of birth and place of residence);
  - iii. Information regarding identification and verification of the right of representation. If the right of representation does not arise from law, name of the document used for establishing and verification of the right of representation, the date of issue and the name or name of the issuing party.
  
- 7.12. If the Client is a legal person, the following data shall be recorded:
  - i. Name of the Client;
  - ii. Registry code (or registration number and registration date) of the Client;
  - iii. Names and authorisations of members of the Management Board or the head of branch or the other relevant body;
  - iv. Telecommunications numbers.

## **8. Simplified due diligence measures**

8.1. Simplified DD measures may be taken, if the Client is:

i. A company listed on a regulated market that is subject to disclosure requirements consistent

with European Union law;

ii. a legal person governed by public law founded in Estonia;

iii. a governmental authority or another authority performing public functions in Estonia or a contracting state of the European Economic Area;

iv. an authority of the European Union;

v. a credit institution or a financial institution, acting on behalf of itself, located in a contracting state of the European Economic Area or in a third country (see Exhibit 1), which in the

country of location is subject to equal requirements and the performance of which is subject

to state supervision.

8.2. Upon identifying and screening of such Clients, the following circumstances, if present concurrently, shall be considered criteria pointing to low level of risk:

## **9.**

i. the Client can be identified on the basis of publicly available information;

ii. the ownership and control structure of the Client is transparent and constant;

iii. the operations of the Client and their accounting or payment policies are transparent;

iv. Client reports to and is controlled by an authority of executive power of Estonia or a contracting state of the European Economic Area, another agency performing public duties,

or an authority of the European Union.

## Enhanced due diligence measures

9.1, 9.2 accordance with the Rules (see Section 10). The risk category may be altered during the course of the Business Relationship, taking into consideration the changes in data gathered.

9.3. The Representative, who upon entering into a Business Relationship with a new Client, detects that there is at least one of the following high-risk characteristics present in respect of a Client, shall consult with and report to the CO, and shall take the DD measures set out in the Rules.

- 9.4. The Representative shall apply enhanced DD measures in the following situations:
  - 9.4.1. when suspicion arises regarding truthfulness of the provided data and/or of authenticity of the identification documents regarding the Client or its Beneficial Owners;
  - 9.4.2. the Client is a PEP (excluding local PEPs, if there are no relevant circumstances, leading to the higher risks);
  - 9.4.3. the Client is from or the seat of a Client being a legal person is located in a third country, which is included in the list of risk countries (see Exhibit 1);
  - 9.4.4. in case of companies that have nominee shareholders or shares in bearer form;
  - 9.4.5. in a situation with higher risk of Money Laundering and terrorists financing as described in Sections 9.1 and 9.3.
  
- 9.5. Enhanced DD measures shall include at least one the following measures in addition to normal DD

measures as established in Section 5.4:

9.5.1. Identification and verification of a Client on the basis of additional documents, data or information, which originates from a reliable and independent source;

9.5.2. Identification and verification of a Client while being present at the same place;

9.5.3. Asking the identification or verification documents to be notarised or officially authenticated; 9.5.4. Obtaining additional information on the purpose and nature of the Business Relationship and

verification from a reliable and independent source;

9.5.5. Reassessment of a risk profile of a Client not later than 6 months after establishment of

Business Relationship.

9.6. After taking enhanced DD measures, the MB shall decide whether to

establish or continue the Business Relationship with the Client in respect of whom the enhanced DD measures were taken.

9.7. If a Client who, by the date of entry into a contract, has not performed any prominent public functions for at least a year, and such person is deemed to pose no further risk specific to PEP, this Client is not considered as the PEP, therefore application of enhanced DD measures is not required.

9.8. The Representative may not apply enhanced DD measures stipulated in section 9.5 to local PEP, if there are no other circumstances leading to the higher risk.

## **10. Risk assessment**

10.1. The Representative will establish a risk profile of a Client based on information gathered under the Rules.

- 10.2. The Provider of service applies the following risk categories:
  - i. Normal risk (the risk level is normal, there are no high risk characteristics present);
  - ii. High risk, which is subcategorized as High risk I and High risk II.
  
- 10.3. For every Client, who does not fall into the "normal risk" category, the Representative shall record

the Client's risk category in the Provider of service's database of Clients and on the documents as "High risk I" or "High risk II". Only the CO shall have the right to change the risk category recorded for a Client. 10.4. Assessment of risk profile of natural persons

10.4.1. When establishing the risk category of a Client being a natural person, the country of residence of the Client, the region where the Client operates, and status of PEP shall be taken into account.

10.4.2. If there are several characteristics of the category "High risk I" present, or if, in addition to the characteristics of "High risk I", at least one of the "High risk II" characteristics is present, the Client shall be determined to be falling into the category "High risk II".

10.4.3. Characteristics of high risk in the case of a natural person, and the appropriate DD measures:



## High risk category I

The Client is a person associated with a PEP.

## High risk category II

The Client is a PEP or a person associated with him or her.

There is information that the Client is suspected to be or to have been linked with a financial offence or other suspicious activities.

## DD measures

The decision is taken by the MB.

## DD measures

Conduct an internet search about the Client.

Ask additional information and documents, which prove the legal origin of Client's assets. Check information about International Sanctions (see also Section 15)<sup>4</sup> or ask guidance from the CO.

Ask additional information and documents, which prove the legal origin of the Client's assets.

The actual place of residence or employment or business of a Client is in a country, which is included in the list of risk countries (see Exhibit 1), or the Client is an official citizen/resident of such country.	Ask the Client to provide additional information about the purpose of establishing the Business Relationship and his/her economic activities. Ask the Client to provide additional information about its links with the said foreign state.
The Client is a local PEP.	Conduct an internet search about the Client. Ask additional information and documents, which prove the legal origin of Client's assets. If there are no other circumstances leading to the higher risk and the MB approves, it is not required to apply enhanced DD measures stipulated in section 10.7.
The Client is a non-resident individual, whose place of residence or activities is in a country, which is listed in the list of risk countries (see Exhibit 1).	Ask the Client to provide additional documents to identify the Client and, if possible, check the Client's data vis-à-vis the previously presented documents and information. Verify and compare the data submitted by the Client against the additional documents, data or information, which originates from a reliable and independent source.

## 10.5. Assessment of risk profile of legal persons

10.5.1. When establishing the risk category of a legal person, assessment shall be based on the

country of location of the legal person, its area of activity, the transparency of ownership

structure and the management.

10.5.2. If there are several characteristics of the category "High risk I", or if, in addition to the

characteristics of "High risk I", at least one of the "High risk II" characteristics is present, the

Client shall be determined to be falling into the category "High risk II".

10.5.3. Characteristics of high risk in the case of a legal person, and the appropriate DD measures

### High risk category I

The Client is situated in a country, which is listed in the list of risk countries (see Exhibit 1).

### DD measures

Ask the Client to provide additional information about its links with the said foreign state. Ask for additional information about the purpose of establishing the Business Relationship.

<p>The Client is a legal person registered in the European Economic Area or in Switzerland, whose area of activity is associated with enhanced money-laundering risk (see Exhibit 1).</p>	<p>Ask the Client to provide additional documents to identify it and, if possible, check the Client's data vis-à-vis the previously presented documents and information. Verify and compare the data submitted by the Client against the additional documents or information, which originates from a reliable and independent source.</p>
<p>The legal person is a non-profit association, trust, civil law partnership or another contractual legal arrangement, whose activities and liability are insufficiently regulated by law, and the legality of financing of which is not easy to screen.</p>	<p>Check the authenticity of the presented documents and verify the accuracy of the data. Ask for help from the CO. Ask the Client to provide information about relationships with other credit or financing institutions, and the opinion of the respective credit or financing institution.  Ask additional information and documents, which prove the legal origin of the Client's assets.</p>

<p>The representative or the Beneficial Owner of a legal person is a local PEP or his or her family member.</p>	<p>Ask the Client to provide additional information about the need and purpose of establishing the Business Relationship.</p> <p>Ask the Client to provide information about relationships with other credit or financing institutions, and the opinion of the respective credit or financing institution about the Client. Conduct an internet search about the Client, being a legal person, and its Beneficial Owner. Ask additional information and documents, which prove the legal origin of the Client's assets.</p> <p>If there are no other circumstances leading to the higher risk and the MB approves, it is not required to apply enhanced DD measures stipulated in section 10.7.</p>
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## High risk category II

There is information that the person is suspected to be or to have been linked with a financial offence or other suspicious activities.

### DD measures

Check information about International Sanctions (see also Section 15)<sup>5</sup> or ask guidance from the CO.

Ask additional information and documents, which prove the legal origin of the Client's assets.

<p>The representative or the Beneficial Owner of a legal person is a PEP or his or her family member.</p>	<p>Ask the Client to provide additional information about the need and purpose of establishing the Business Relationship.</p> <p>Ask the Client to provide information about relationships with other credit or financing institutions, and the opinion of the respective credit or financing institution about the Client. Conduct an internet search about the Client, being a legal person, and its Beneficial Owner.</p> <p>Ask additional information and documents, which prove the legal origin of the Client's assets.</p>
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<p>A legal person registered outside the European Economic Area, whose field of business is associated with a high risk of Money Laundering (see Exhibit 1).</p>	<p>Ask the Client to provide additional information about its links with the said foreign state.</p>
<p>A legal person registered outside the European Economic Area, who is operating outside the country of its registered location.</p>	<p>Ask for additional information about the purpose of establishing the Business Relationship.</p>
<p>A legal person is operating or is registered in a low tax rate country (see Exhibit 1) or the place of residence, place of registration of the legal person, its owners or Beneficial Owners, or the territory of business of the legal person is situated in a country listed in the list of risk countries (see Exhibit 1).</p>	<p>Verify and compare the data submitted by Client against the additional documents, data or information, which originates from a reliable and independent source (if obtaining such information is possible).</p> <p>Ask additional information and documents, which prove the legal origin of the Client's assets.</p>

10.6. The above listed DD measures can be combined, as appropriate, in respect to other listed or non- listed risks.

#### 10.7. Identification and management of risks of technology and services

10.7.1. The Provider of service uses safe technological solution for providing services and implements physical and personal measures to keep safety, such as hardware cryptocurrency wallets.

10.7.2. The Provider of service uses special technical solution AES 256 bit encryption to keep provided service in safe and keeps history of transactions.

10.7.3. Advantages of authorisation process, security of accounts.

10.7.3.1. Authorisation process will be with 2FA by Google, IP protection (white list of IP addresses). 10.7.3.2. For withdrawal The Provider of Service will use SMS verification of each transaction – one- time password

10.7.4. In case of hacking of the technological solution, activities for mitigation of risk, including backup system.

10.7.4.1. The Provider of Service uses several servers. The Provider of Service has a separate server for hot cryptocurrency wallets which is connected with other servers by secured protocol with 256 AES encryption and SHA512 hash signature of each packet.

10.7.4.2. This server makes wallets backup every day. This server is locked by firewall and is accessible only for some IP addresses.

10.7.4.3. All ports are closed.

10.7.5. The Provider of Service sets limits for holding each cryptocurrency and after increasing balance on any wallets more than the limited amount, the Provider of Service automatically sends funds to the hardware wallet.

10.7.6. Securing safety in the Provider of service.

10.7.6.1. The board member is personally responsible for the security, monitoring, identifies and reports to the MB.

10.7.7. As a rule, the Provider of service systematically analyses whether adoption of additional security measures is required.

## **11. Registration and storage of data**

11.1. The Representative shall ensure that Client data are registered in the Provider of service's Client database within the required scope.

- 11.2. Registration of data of a Client who is natural person

11.2.1. The following obtained data shall be recorded in the Provider of service's information system:

- i. Name, personal ID code or, in the absence of the latter, date of birth and the address of the person's permanent place of residence and other places of residence;
- ii. the name and number of the document used for identification and verification of the identity of the person, its date of issue and the name of the issuing authority;
- iii. occupation, profession or area of activity – establish the area of activity (occupation) and the status of the person (trader, employee, student, pensioner);
- iv. If the Client is a natural person, the Representative shall record information about whether the person is performing or has performed prominent public functions, or is a close associate or family member of the person performing prominent public functions;
- v. Citizenship and the country of tax residency;

vi. the origin of assets.

- 11.2.2. In case of a representative, the following info shall be recorded:
  - i. same as provided for in points i-ii of Section 11.2.1;
  - ii. the name of the document used for establishing and verification of the right of representation, the date of issue and the name or name of the issuing party.
- 11.2.3. If the Business Relationship is established by the Client or the representative with the use of the ID card or other e-identification system, the data of the document used for identification is saved automatically in the digital signature. If identification takes place at a face-to-face meeting with the Client, the data of the document used for identification is recorded on the copy of the identification document.
- 11.3. Registration of data of a Client who is a legal person
  - 11.3.1. The following information on the Client being a legal person shall be recorded:
    - i. Name, legal form, registry code, address, date of registration and activity locations;
    - ii. information concerning means of communication and contact person(s);
    - iii. names of the members of the management board or an equivalent governing body, and their powers to represent the Client, and whether any of them is a PEP;
    - iv. information about the Beneficial Owners;
    - v. Field(s) of activity (i.e. the NACE codes);
    - vi. name and number of the document used for identification and verification of the identity, its date of issue and the name of the issuing authority;
    - vii. country of tax residency of the legal person (VAT number);
    - viii. date of registration of the legal person in the Provider of service's database;
    - ix. purpose of the Business Relationship;
    - x. origin of assets (normal business operations/other);
  - 11.3.2. The following information about the Beneficial Owner shall be recorded:
    - i. Name, personal ID code or, in the absence of the latter, date of birth and place of residence;
    - ii. type of control over the enterprise (e.g. shareholder);
    - iii. is the person a PEP;

iv. information about the representative as set forth under 11.2.2.

- 11.3.3. If the Business Relationship is established by the representative of the Client with the use of the ID card or other e-identification system, the data of the document used for identification is saved automatically in the digital signature. If identification takes place at a face-to-face meeting with the representative of the Client, the data of the document used for identification is recorded on the copy of the identification document.

11.3.4. Information from the B-card, i.e. the legal representatives of the Client being a legal person stated on the B-card, shall be recorded on the Client data registration sheet or the contract concluded with the Client.

- 11.4. The Representative shall record all the data regarding
  - 11.4.1. Provider of service's decision to refuse establishment Business Relationship. The Representative shall record all the data, if, as a result of taking DD measures, a person refuses to establish the Business Relationship.
  - 11.4.2. Impossibility to take DD measures due to information technology means;
  - 11.4.3. Termination of the business relationship, as a result of impossibility to take DD measures;
- 11.5. Storage of Data
  - 11.5.1. The respective data is stored in a written format and/or in a format reproducible in writing and, if required, it shall be accessible by all appropriate staff of the Provider of service (MB, Representatives, marketing, CO etc).
  - 11.5.2. The originals or copies of the documents, which serve as the basis for identification a person, and of the documents serving as the basis for establishing a Business Relationship, shall be stored for at least five (5) years following the termination of the Business Relationship.
  - 11.5.3. The data of the document prescribed for the digital identification of a Client, information on making an electronic query to the identity documents database, and the audio and video recording of the procedure of identifying the person and verifying the person's identity shall be stored at least five (5) years following the termination of the Business Relationship.
  - 11.5.4. Also to be stored:
    - i. manner, time and place of submitting or updating of data and documents;
    - ii. name and position of Representative who has established the identity,

checked or updated  
the data.

- **Reporting**

- 12.1. Notification of the CO

12.1.1. Any circumstances identified in the Business Relationship are unusual or suspicious or there are characteristics which point to Money Laundering, Terrorist Financing, or an attempt of the same the Representative shall promptly notify the CO.

12.1.2. The CO shall analyse and forward the respective information to the MB.

- 12.2. Notification of FIU

12.2.1. Before reporting any transaction connected with suspected Money Laundering or Terrorist

Financing to the FIU, the CO shall analyse the content of the information received, considering

the Client's current area of activity and other known information.

12.2.2. The CO shall decide whether to forward the information to the FIU and the MB shall decide

whether to terminate the Business Relationship.

12.2.3. The CO shall make a notation "AML" behind the name of the Client in the Provider of service's

Client database or on the documents, and shall notify the FIU promptly, but not later than within 2 business days after discovering any activities or circumstances or arising of suspicion, using the respective web-form for notifying the FIU. Copies of the documents as set forth by guidelines of FIU or further requested by FIU shall be appended to the notice.

12.2.4. The FIU shall be notified of any suspicious and unusual transactions where, including such where the financial obligation exceeding 32 000 euros or an equivalent amount in another currency is performed in cash, regardless of whether the transaction is made in a single payment or several related payments.

12.2.5. The CO shall store in a format reproducible in writing any reports received from the Representatives about suspicious circumstances, as well as all information gathered to analyse such notices, as well as other linked documents and notices to be forwarded to the FIU, along with the time of forwarding the notice, and the information about the Representatives who forwarded the same.

12.2.6. The Client who is reported to the FIU as being suspicious, may not be informed of the same. 12.2.7. It is also prohibited to inform any

third persons, including other Representatives, of the fact that information has been reported to the FIU, and the content of the reported information,



except for the MB/CO.

- 12.3. Termination of the Business Relationship with a Client in the event of suspected Money Laundering

and Terrorist Financing

12.3.1. Pursuant to law, the Provider of service is obliged to extraordinarily and unilaterally terminate the Business Relationship without observing the advance notification period, if:

- i. The Client fails to present upon identification or upon updating the previously gathered data or the taking of DD measures, true, full and accurate information, or
- ii. The Client or a person associated with the Client does not present data and documents evidencing of the lawfulness of the economic activities of the Client, or
- iii. the Provider of service suspects for any other reasons that the Client or the person associated with the Client is involved in Money Laundering or Terrorist Financing, or
- iv. the documents and data submitted by the Client do not dispel the Provider of service's suspicions about the Client's possible links with Money Laundering or Terrorist Financing.

12.3.2. The decision on terminating the Business Relationship shall be taken by the Management

Board, considering also the proposal of the CO.

12.3.3. The Client shall be notified of the termination of Business Relationship in writing, provided

that it is consistent with Section 12.2.7. Notation about the cancellation of the Business Relationship shall be made in the Provider of service's Client database or documentation, and a note "AML" shall be added to the Client's data, provided that it is consistent with Section 12.2.8.

12.4. Indemnification of the Representatives

12.4.1. The Provider of service and its Representatives shall not, upon performance of the obligations

arising from the Rules, be liable for damage arising from failure to carry out any transactions (by the due date) if the damage was caused to the persons in connection with notification of the FIU of the suspicion of Money Laundering or Terrorist Financing in good faith, or for damage caused to a Client or in connection with the cancellation of a Business Relationship on the basis provided in Section 12.3.

12.4.2. Fulfilment of the notification obligation by the Representative acting in good faith, and reporting the appropriate information shall not be deemed breach of the confidentiality obligation imposed by the law or the contract, and no liability stemming from the legislation or the contract shall be imposed upon the person who has performed the notification obligation.

### **13. Implementation of International Sanctions**

13.1. The Provider of service is required to implement International Sanctions in force.

13.2. Representatives shall draw special attention to all its Clients (present and new), to the activities of the Clients and to the facts which refer to the possibility that the Client is a subject to International Sanctions. Control and verification of possibly imposed International Sanctions shall be conducted by the Representatives as part of DD measures applied to the Clients in accordance with these Rules.

13.3. The Representatives who have doubts or who know that a Client is subject to International Sanctions, shall immediately notify the CO. In case of doubt, if the CO finds it appropriate, the Representative shall ask the Client to provide additional information that may help to identify whether he/she is subject to International Sanctions or not.

13.4. The CO shall be responsible for the implementation of International Sanctions.

13.4.1. The CO shall:

- i. regularly follow the webpage of FIU ([https://www2.politsei.ee/et/organisatsioon/rahapesu/finants sanktsiooni-subjekti-otsing- ja-muudatused-sanktsioonide-nimekirjas/](https://www2.politsei.ee/et/organisatsioon/rahapesu/finants sanktsiooni-subjekti-otsing-ja-muudatused-sanktsioonide-nimekirjas/)) and immediately take measures provided for in the act on the imposition or implementation of International Sanctions;
- ii. upon entry into force of an act on the imposition or implementation of International Sanctions, the amendment, repeal or expiry thereof, immediately check whether any of the Clients is subject to International Sanctions with regard to whom the financial sanction is imposed, amended or terminated;
- iii. if an act on the imposition or implementation of International Sanctions is repealed, expires or is amended in such a manner that the implementation of International Sanctions with regard to the subject of

International Sanctions is terminated wholly or partially, terminate the implementation of the measure to the extent provided for in the act on the imposition or application of International Sanctions;

- iv. keep an updated record of subjects of International Sanctions and submit this information to the Representatives in the form that allows to use this information in the course of their activity;
- v. provide training to the Representatives that allows them to establish independently the subjects of International Sanctions;
- vi. assist the Representatives if they have doubt or knowledge that a Client is a subject to International Sanctions;
- vii. supervise the application of the Rules regarding the implementation of International Sanctions by the Representatives;
- viii. review and keep updated the Rules regarding the implementation of International Sanctions
- ix. notify FIU of Clients who are subject to International Sanctions or in part of whom the CO, the Representatives have doubts;
- x. keep record of made checks, notifications submitted to FIU and applied measures in part of detected subjects to International Sanctions.

13.4.2. When making checks on Clients as to detect whether they are subject to International

Sanctions, the following information shall be recorded and preserved for five years: Time of inspection;  
Name of person who carried out inspection;  
Results of inspection;

i. ii. iii. iv.

13.4.4. The Client who is subject to International Sanctions and about whom the notification is made, shall not be informed of the notification.

13.4.5. Application of special measures and sanctions on the Client who is detected to be subject to International Sanctions should be authorized by FIU.

13.4.6. When making checks of Clients, the possible distorting factors in personal information (i.e. way of written reproduction of name etc.) must be kept in mind.

## **14. Training**

14.1. The Provider of service shall ensure that all Representatives who have contacts with Clients or matters involving Money Laundering are provided with regular training and information about the nature of the Money Laundering and Terrorist Financing risks, as well as any new trends within the field. The CO shall arrange regular training concerning prevention of Money Laundering and Terrorist Financing to explain the respective requirements and obligations.

14.2. Initial training is provided at the start of representative's service. The Representatives who are communicating with the Clients directly may not start working before they have reviewed and committed to the adherence of these Rules or participated in the Money Laundering and Terrorist Financing prevention training.

14.3. Training is provided regularly, at least once a year, to all Representatives and other relevant designated staff of the Provider of service. Training may be provided also using electronic means (conference calls, continuous e-mail updates provided confirmation on receipt and acceptance is returned and similar means).

14.4. Training materials and information shall be stored for at least three years.

## **15. Internal audit and amendment of the Rules**

15.1. Compliance with the Rules shall be inspected at least once a year by the CO, whose job duties are set out in Section 4.1.

15.2. The report on the results of the inspection concerning the compliance with the measures for prevention of Money Laundering and Terrorist Financing shall set out the following information:

- i. time of the inspection;
- ii. name and position of the person conducting the inspection;
- iii. purpose and description of the inspection;

iv. analysis of the inspection results, or the conclusions drawn on the basis of the inspection. 15.3. If the inspection reveals any deficiencies in the Rules or their implementation, the report shall set out the measures to be applied to remedy the deficiencies, as well as the respective time schedule and the time of a follow-up inspection.

15.4. If a follow-up inspection is carried out, the results of the follow-up inspection shall be added to the inspection report, which shall state the list of measures to remedy any deficiencies discovered in the course of the follow-up inspection, and the time actually spent on remedying the same.

15.5. The inspection report shall be presented to the MB, who shall decide on taking measures to remedy any deficiencies discovered.

Measures taken.

13.4.3. If in the course of the check, it shall be detected that a Client or a person who used to be a

Client is subject to International Sanctions, the CO shall notify the Representatives who dealt with this Client, the Management Board and FIU. The notification shall be submitted at least in the way that allows its reproduction in writing.

Updated:	Risk category

## Client data sheet ('know your customer')

Name, address, etc.	Name	
	Personal code/Date of birth/Registry code	
	Address/Location	
	Citizenship (in case of natural person)	
	Occupation, area of activity	
	Name and date of issuance of document used for identification (in case of natural person and representative of legal person)	
	Name and number of the document used for identification and verification of the identity of a foreign legal person	
	Postal code and city	
	The country of tax residency	
	Area of activity (in case of legal person)	
	E-mail	Telephone
	Contact person and e-mail	Telephone
	Have the securities of the company been accepted for trading on a regulated securities market? (in case of legal person) NO YES, if Yes, then on which securities market?	
	Beneficial Owner (in case of legal person)	Record the Beneficial Owners: <i>A Beneficial Owner is a natural person who:</i> <i>i. Taking advantage of his influence, exercises control over a transaction, operation or another person and in whose interests or favour or on whose account a transaction or operation is performed taking advantage of his influence, makes a transaction, act, action, operation or step or otherwise exercises control over a transaction, act, action, operation or step or over another person and in whose interests or favour or on whose account a transaction or act, action, operation or step is made.</i> <i>ii. Ultimately owns or controls a legal person through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that person, including through bearer shareholdings, or through control via other means. Direct ownership is a manner of exercising control whereby a natural person holds a shareholding of 25 per cent plus one share or an ownership interest of more than 25 per cent in a company. Indirect ownership is a manner of exercising control whereby a company which is under the control of a natural person holds or multiple companies which are under the control of the same natural person hold a shareholding of 25 per cent plus one share or an ownership interest of more than 25 per cent in a company.</i> <i>iii. Holds the position of a senior managing official, if, after all possible means of identification have been exhausted, the person specified in clause ii cannot be identified and there is no doubt that such person exists or where there are doubts as to whether the identified person is a beneficial owner.</i> <i>iv. In the case of a trust, civil law partnership, community or legal arrangement, the beneficial owner is the natural person who ultimately controls the association via direct or indirect ownership or otherwise and is such associations': settlor or person who has handed over property to the asset pool, trustee or manager or possessor of the property, person ensuring and controlling the preservation of property, where such person has been appointed, or the beneficiary, or where the beneficiary or beneficiaries have yet to be determined, the class of persons in whose main interest such association is set up or operates.</i>
Does the company have Beneficial Owners:		

	YES NO, if No, please explain:	
	Name	Personal ID code/ DOB
	Place of residence	Citizenship
		Shareholding (%)
	Name	Personal ID code/ DOB
	Place of residence	Citizenship
		Shareholding (%)
	Name	Personal ID code/ DOB
	Place of residence	Citizenship
		Shareholding (%)

Members of the MB (in case of legal person)	Name	Personal ID code/ DOB	
	Place of residence	Copy of the ID document appended YES	Valid till
		Personal ID code/ DOB	
	Place of residence	Copy of the ID document appended YES	Valid till
		Personal ID code/ DOB	
	Place of residence	Copy of the ID document appended YES	Valid till
Personal ID code/ DOB			

Authorised persons (representatives)	Name	Personal ID code/ DOB	
	Place of residence	Copy of the ID document appended YES	Valid till
		Power of attorney appended YES	Valid till
	Name	Personal ID code/ DOB	
	Place of residence	Copy of the ID document appended YES	Valid till
		Power of attorney appended YES	Valid till
	Name	Personal ID code/ DOB	
	Place of residence	Copy of the ID document appended YES	Valid till
		Power of attorney appended YES	Valid till

Purpose of the Business Relationship	Please specify
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Identification of Politically Exposed Persons (to be filled if relevant)	<p>Record on the Beneficial Owners, members of the MB or authorised representative a Politically Exposed Person.</p> <p><i>A Politically Exposed Person is a natural person who is or who has been entrusted with prominent public functions including a head of state, head of government, minister and deputy or assistant minister; a member of parliament or of a similar legislative body, a member of a governing body of a political party, a member of a supreme court, a member of a court of auditors or of the board of a central bank; an ambassador, a chargé d'affaires and a high-ranking officer in the armed forces; a member of an administrative, management or supervisory body of a state-owned enterprise; a director, deputy director and member of the board or equivalent function of an international organisation, except middle-ranking or more junior officials.</i></p> <ul style="list-style-type: none"> <li>• The provisions set out above also include positions in the European Union and in other international organizations.</li> <li>• A family member of a person performing prominent public functions is the spouse, or a person considered to be equivalent to a spouse, of a politically exposed person; a child and their spouse, or a person considered to be equivalent to a spouse, of a politically exposed person; a parent of a politically exposed person.</li> <li>• A close associate of a person performing prominent public functions is a natural person who is known to be the beneficial owner or to have joint beneficial ownership of a legal</li> </ul>
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## **Exhibit 1**

### **Exhibit 1a. Contracting states of the European Economic Area**

Please refer to <http://elik.nlib.ee/pohifakte-euroopa-liidust/liikmesriigid-euroopa-majanduspiirkonna-riigid/>

### **Exhibit 1b. Countries who have established Anti-Money Laundering requirements equivalent to the European Union AML framework**

Please refer to [https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations\\_en](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations_en)

### **Exhibit 1c. List of risk countries** (countries which according to FATF does not follow requirements of prevention of Money Laundering and Terrorism Financing)

Please refer to: <http://www.fatf-gafi.org/countries/#high-risk>

### **Exhibit 1c. List of risk countries** (countries which according to the FIU are under big threat of terrorism)

Afghanistan, Algeria, United Arab Emirates, Bahrein, Bangladesh, Egypt, Indonesia, Iraq, Iran, Yemen, Jordanian, Qatar, Kuwait, Lebanon, Libya, Malaysia, Mali, Morocco, Mauritania, Nigeria, Oman, Pakistan, Palestine, Saudi Arabia, Somalia, Sri Lanka, Sudan, Syria, Tunisia, Turkey, Ethnic groups of Caucasus belonging to Russian Federation (chechens, lesgid, ossetians, ingushes etc.)

### **Exhibit 1d. List of countries that are NOT regarded as low tax rate countries**

<https://www.emta.ee/et/ariklient/tulud-kulud-kaive-kasum/mitteresidendi-eeesti-tulumaksustamine/nimekiri-territooriumidest>