

## Information for Law Enforcement officers and Statement on Combating Money Laundering and Terrorist Financing

- 1) Trust Pay, a.s. with legal seat Za kásárňou 315/1, 831 03 Bratislava, Slovak Republic, ID 36865800, registered in the Commercial Register of District Court Bratislava I, Section Sa, File no. 4919 / B (hereinafter referred to as "**TrustPay**") is a payment institution, which acquired in 2009 permission granted by the National Bank of Slovakia (n. NBS OPK - 170931 / 2009 - [nbs.sk](http://nbs.sk)) to provide payment services pursuant to Law no. 492/2009 Coll. Payment Services (hereinafter referred to as the "**PSA**"). TrustPay is among the first-ever payment institutions in Slovakia.

Within the single European license, TrustPay is authorized to provide payment services in the European Economic Area. In terms of the PSA, TrustPay is also authorized (after fulfilment of legal conditions) to provide payment services through Payment Services Agents which provide payment services on behalf TrustPay on a basis of written contract. Payment Services Agents as well as TrustPay are subject to supervision by the National Bank of Slovakia.

TrustPay and Payment Services Agents Trustpay allow to perform payment transactions - transferring funds from a payment account or on a payment account in TrustPay. They are not the owners of these funds, the final beneficiaries of the payments and not even the beneficial owners.

Activity of Trustpay focuses on providing payment services to merchants who sell their goods or services over the Internet. Customers of merchants are entering sensitive data from their credit cards when buying goods or services over the Internet. TrustPay complies with all safety standards in processing payments.

- 2) **TrustPay is interested in a safe and legal provision and use of its services and for this purpose cooperates with local and national law enforcement authorities. National law Enforcement officers may, if request general information related to the services provided by TrustPay, contact the company via email [info@trustpay.eu](mailto:info@trustpay.eu) or by phone at +421 2321 68 450. Foreign law enforcement officers may contact appropriate Slovak authorities to request assistance according to the European Convention on Mutual Assistance in Criminal Matters.**

- 3) Trust Pay, a.s. is fully aware of the risks arising from the possible misuse of its services for the legalization of profits from criminal activities and for terrorist financing by means of business activities of certain clients. Therefore, Trust Pay has formed a new concept of fighting against money laundering and terrorist financing (hereinafter referred to as „**AML**“) which respects recognized international standards, regulations of the EU, legislation of the Slovak Republic as well as other norms in the area of prevention of money laundering and terrorist financing. AML comprises the basic principles which TrustPay applies regarding the relation with clients as well as the relation with its own employees with the goal of eliminating the risk arising from the possible linking of the financial sector with the criminal and terrorist sphere. Trust Pay declares that:

- a) In terms of its activities, it fully complies with the legislation of the European Union and the Slovak Republic in the area of prevention of the misuse of the financial system with the purpose of legalization of profits from criminal activities and terrorist financing (AML) and primarily with Act. No. 297/2008 Coll. on the protection against legalization of profits from criminal activities and on the protection against terrorist financing and on the amendment and supplementation of certain acts. We also respect international standards in the area of AML and primarily the guidance of the Financial Action Task Force on AML.
- b) We have formed our own concept of AML which complies with all legislation requirements of the European Union and the Slovak Republic and which all the employees are acquainted with by means of regular annual training sessions and by means of the internal directive.

- c) The organizational structure of TrustPay is defined in proper and transparent manner, whereby the power and responsibility for AML is determined in the framework of the Charter and internal order. In terms of the TrustPay structure, a department responsible for the implementation and fulfilment of AML principles is established and a person in charge of the AML is appointed.
- d) We follow the policy and principles of "Know Your Client" in terms of which we are familiar with the true identity of our clients; in certain cases, we detect ownership relations and close links of clients – legal persons and end users of benefits; in certain cases we perform an in-depth control of clients in terms of which we identify the source of their financial means or property and find other information on the aim and the intended character of business;
- e) We review all our potential clients' data inspecting whether they are on international lists of persons or movements supporting terrorism;
- f) We update and archive identification data of clients in accordance with § 19 of Act No. 297/2008 Coll. and in accordance with General Data Protection Regulation 679/2016.
- g) TrustPay examines all intended and executed business activities from the point of view of possible unusualness. We monitor the accounts of our clients focusing on suspicious operations. The review is conducted by professionally trained employees of TrustPay as well as by means of technology TrustPay has at its disposal which processes and evaluates data on clients and business. This system enables to register and archive all relevant information for the purpose of evaluation and decision on department and TrustPay management level. In case the business is evaluated as unusual, the system of internal reports also serves as means of reporting this kind of business to the intelligence unit of the financial police in compliance with legislation.
- h) TrustPay does not open anonymous accounts and does not conduct business with clients which refuse to identify themselves. We also do not conduct business with fictitious banks or banks which reside in locations where the relevant jurisdiction is likely not to have implemented sufficient means of fighting against money laundering.
- i) All TrustPay employees regardless of their position take part in annual AML training sessions. The area of AML is regularly reviewed, updated and harmonized with international legislation norms and legislation norms of the EU and the Slovak republic.

All the above listed basic principles have been elaborated and specified in multiple internal regulations. One of the most important regulations is the "Program of own activities aimed against money laundering and terrorist financing" which is part of the internal Compliance Manual of TrustPay. It also contains regulation on the procedure regarding the identification of clients and unusual business. The obligations and procedures elaborated in internal regulations are binding and obligatory for all TrustPay employees.

- 4) **TrustPay declares that it has never been sanctioned or sued in connection with money laundering or terrorist financing.**