



## 1. OBJECTIVE OF THE AML POLICY

Marvli Payment OÜ is required to comply with anti-money laundering (AML) regulations in our operations. All of our employees are committed to adhering to the strictest AML and Know Your Customer (KYC) regulations to reduce the possibility that our services will be used to support financial crimes.

We have adopted the AML Policy framework to ensure that all required measures are taken to ensure the complete security of our services. In this AML Policy, we pledge to adhere to the provisions outlined by Canadian AML laws and worldwide AML recommendations.

## 2. WHAT IS AML POLICY?

AML Policy is the mechanism designed to prohibit the use of our services for money laundering, terrorism funding, or any other illegal activity. KYC procedures are included in the AML Policy. The purpose of KYC measures is to enable organizations to better know and understand their customers and to assist them in risk management. In the future, we may revise this approach to ensure compliance with existing laws and AML best practices.

In the event of potentially suspicious or unusual transactions or client behaviour, we take the necessary precautions to mitigate the risks. As considered relevant, all personnel processing transactions may request further papers such as proof of source of funds, etc.

We maintain an orderly system for keeping all records, including client identification documents and related information. All customer and transactional data is stored confidentially and in accordance with laws protecting personal data.

### **Our AML Policy includes:**

- Identification and verification of the consumer prior to the establishment of a financial business connection.
- Implementation and maintenance of risk-based customer due diligence, including enhanced due diligence for customers posing greater risks.
- Transaction monitoring of the financial behaviour of the customer based on a risk-based analysis.
- Procedures for internal and external reporting of suspected conduct to the appropriate law enforcement authorities.
- Regular AML training for our personnel.

Within the client's due diligence process, we are required to reject the customer's documents, close the account, and terminate the business connection if we discover any suspicious activity, fake documents, or non-cooperation from the customer.