

AML (Anti-Money Laundering) POLICY

(The policy directed at anti-money laundering derived from the illegal activities)

What is Anti-Money Laundering?

Illegally obtained funds, within the meaning of the terms of the Criminal Code of the Republic of Croatia, are a material gain derived from criminal activity.

Money laundering is actions that hide the source of funds in order to make their nature seem lawful. As per the Criminal Code of the Republic of Croatia, money laundering is: 1) investing, taking over, converting, transferring or replacing illegally obtained funds for the purpose of concealing or disguising their illicit origin; 2) concealing, disguising the true nature, source, location, disposition, movement, rights with respect to, or ownership of proceeds of crime; 3) acquiring, possessing or using the proceeds of crime.

Money laundering includes various manipulations with monetary funds with the purpose of hiding their illegal origin.

Generally, the money laundering derived from the illegal activities consists of three stages:

- 1. Placement:** introduction of cash originating from illegal/criminal activities into financial or non-financial institutions.
- 2. Stratification (layering):** separating the proceeds of criminal activities from their source through the use of layers of complex financial transactions. These layers are designed to hamper the audit trail, disguise the origin of funds and provide anonymity.
- 3. Integration:** placing the laundered proceeds back into the economy in such a way that they enter the financial system as apparently legitimate funds.

Anti-money laundering – AML incorporates a complex of measures aimed at prevention of use of the Website of ROBOCASH for money laundering, for instance, as result of robbery, fraud, trafficking in drugs and human beings and other illegal activities (disguising the illegal origin and criminal nature of funds) or terrorism financing. The objective of fighting terrorism financing is to prevent the involvement of ROBOCASH in provision of financial support to terrorists or organizations of terrorist acts.

ROBOCASH pays special attention to compliance with the international requirements in the field of the prevention of money laundering and terrorism financing. To this purpose, ROBOCASH has implemented an internal control system which ensured in-depth research and analysis and operational control of financial transactions performed through the Website of ROBOCASH.

The Policy applies to all employees of our Company and aims to setup key roles and responsibilities for the staff members as well as to ensure compliance with the legislation in the field of the prevention of money laundering.

How do we work?

- We trust only highly competent personnel of our Company who works in close contact with our Customers and Partners, our aim is full understanding and knowledge of our Customers and Partners with whom we enter into business relations.
- We improve our AML policy and procedures continuously, and they comply with the requirements of Croatian law, but in some aspects even excel such requirements. We make considerable investments in this process and ensure continuous training of our staff members in this area.
- We purchase and work out new technologies independently that enable us to prevent possible attempts of money laundering
- We understand that anti-money laundering and statement of terrorism financing is a continuous process that requires constant attention and ability to monitor unlawful financial schemes.
- We comply with the legal requirements of the Republic of Croatia for anti-money laundering. In cases set forth in the relevant legal acts, our Company cooperates with officials and government institutions of the Republic of Croatia.

In light of the mentioned above, ROBOCASH:

- neither accepts nor disburses cash;
- deals with Customers' bank accounts opened with a credit establishment registered in EU and Swiss Confederation, or -
- neither accepts, nor transfers funds to accounts of third parties.

Identification and monitoring of Customers

During the Customers' remote registration process on our website each of them shall be identified.

We do not onboard a Customer who does not have a bank account opened with a licensed credit establishment registered in Croatia, a branch of a foreign credit establishment in Croatia or any other EU or Swiss Confederation credit establishment. The first payment should be made from such an account only; otherwise, ROBOCASH will refuse onboarding to the relevant Customer. All Customers are evaluated in accordance with their risk level. Each funds transfer made through our website is in-depth treated and examined.

Applicable laws

1. **Anti-Money Laundering and Terrorist Financing Law** available at the Republic of Croatia Ministry of Finance website [here](#).
2. **Directive (EU) 2015/849** of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council, and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC available [here](#).