

AML (Anti-Money Laundering) Statement

What is Money Laundering? What is financing of terrorism?

Money laundering is the process of concealing the illicit origin of proceeds from criminal activities. Criminals engage in money laundering to legitimise their ill-gotten gains by disguising the sources, changing the form, or relocating the funds to avoid attracting attention. Various criminal acts, such as illegal arms sales, smuggling, organised crime activities like drug trafficking and prostitution rings, as well as white-collar crimes like embezzlement and insider trading, generate substantial profits that motivate individuals or groups to launder money. The goal is to control the funds without revealing the underlying criminal activity or the people involved.

The financing of terrorism involves the collection or provision of funds for terrorist purposes. Terrorism poses a significant threat to peace, security, and human rights. Unlike money laundering, funds for terrorism can originate from both legal and illicit sources. Terrorist financiers exploit loopholes and differences in national anti-money laundering and combating the financing of terrorism systems, taking advantage of weak or ineffective legal and institutional frameworks in certain jurisdictions. Money laundering and the financing of terrorism are both financial crimes with economic consequences, highlighting the importance of effective anti-money laundering and combating the financing of terrorism regimes to safeguard the integrity and stability of financial markets worldwide.

What is Anti-Money Laundering?

Anti-money laundering – AML incorporates a complex of measures aimed at prevention of use of the Robocash d.o.o., registration number: 081224371, VAT: 43870894097 registered address: Petračiceva 4, Zagreb, 10110, Croatia (hereinafter - 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 organisation 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 Robocash.

The statement is applicable to all clients of the Robocash investment platform and is designed to ensure adherence to legislation pertaining to the prevention of money laundering.

How do we work?

- We trust only highly competent personnel of Robocash who work 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. We make considerable investments in this process and ensure continuous training of our staff members in this area.
- We purchase and develop independently new technologies that enable us to prevent possible attempts of money laundering.
- We understand that anti-money laundering and terrorism financing is a continuous process that requires constant attention and ability to monitor unlawful financial schemes.

- We conduct regular internal and external audits to assess the effectiveness of our compliance program and identify any areas for improvement.
- We comply with the legal requirements of the Republic of Croatia for anti-money laundering. In cases set forth in the relevant legal acts, Robocash cooperates with officials and government institutions of the Republic of Croatia.

In light of mentioned above Robocash:

- Does not accept customers residing outside the EU, Switzerland or the United Kingdom, maintaining anonymous or fictitious accounts.
- Neither accepts nor disburses cash.
- Neither accepts nor transfers funds to accounts of third parties.
- Refuses cooperation with customers connected to illicit activities or unwilling to complete identification requirements.
- Does not establish cooperation with those customers present on mandatory screening watchlists (e.g., sanctions, terrorists, organized crime), issuing shares in bearer form, shell companies, internally blacklisted customers, and Politically Exposed Persons (PEPs), political organizations, family foundations, charity organizations, non-profit unregulated organizations, "gatekeepers."
- Has appointed an Anti-Money Laundering officer and implemented a comprehensive Anti-Money Laundering/Combating the Financing of Terrorism program.
- Prohibits business relationships with customers involved in activities such as armament manufacturing, cash businesses, casinos, high-value goods dealers, multi-level marketing, adult entertainment, virtual currencies, online alcohol/tobacco/supplement trading, drug paraphernalia, and servicing illegal goods/services.
- Conducts mandatory screening against sanctions lists (UN, EU, OFAC, US Department of the Treasury, National sanctions) for all customers, vendors, contractors, and parties before entering into a business relationship.

Identification of Customers

During the Customer's registration process on our website each of them shall be identified. For this purpose Robocash has worked out internal normative documents prescribing the careful examination of each new Customer before becoming a fully registered user of the Website of Robocash. In spite of the fact that the Customer is identified remotely, we should register the Customer, who is a resident of EU or Switzerland or the United Kingdom, is the true beneficial owner and Transactions on the Website of Robocash are performed on behalf of the Customer, has the current account opened in its name with a payment institution, credit institution or its branch registered in EU or Switzerland or United Kingdom. During the registration process Robocash uses the information relating to the Customer provided by the credit establishment from which account the payment has been made, as well as compares the information mentioned above with the information provided by the Customer itself while filling in the registration application on the Website of Robocash. If during the identification process any information relating to the Customer arises suspicions of our officials, Robocash either refuses the registration to relevant Customer without notifying the reason, or requires additional information.

Monitoring of payments

We conduct a comprehensive review and analysis of every funds transfer made through our website. We have established a set of internal documents containing detailed analysis and monitoring criteria for funds transfers to our website. These criteria are applied throughout the entire business relationship with our customers.

Risk management and assessment

After risk assessment, Robocash applies appropriate measures and procedures to focus its effort in those areas where the risk of money laundering and terrorism financing appears to be higher. Risk

assessment is not an isolated event of a limited duration. This is a continuous process, carried out on a dynamic basis.

Applicable law

1. Law on Prevention of Money Laundering and Financing of Terrorism (Official Gazette, No. 108/17 , 39/19 , 151/22) [available here](#)
2. Criminal Code (Official Gazette, No. 118/2018) [available here](#)
3. The Rulebook on informing the Office for the Prevention of Money Laundering about suspicious transactions, assets and persons (Official Gazette, No. 1/2019 and 11/2023) [available here](#) and [here](#)
4. The Rulebook on the minimum technical conditions that must be met by means of video-electronic identification (Official Gazette, No. NN 9/2024) [available here](#)