



COMPANY NUMBER 12230765

REGISTERED OFFICE ADDRESS: 18, KING WILLIAM STREET, LONDON, EC4N 7BP

Risk Appetite Statement

V1.0 – 2021(03)

Trading Address: 18, King William Street, London, England, EC4N 7BP
Phone: +44 (0) 208 089 9089

**Authorised and regulated by the Financial Conduct Authority under Firm Reference
Number: 901069**



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Montify LTD ("the Company", "the Firm", "we", "us" or "our") is a company registered in England and Wales under registration number: **12230765**, and the address of our Registered Office and Trading Address is at **18, King William Street, London, EC4N 7BP**. We are authorised and regulated by the Financial Conduct Authority ("FCA") under the Financial Services and Markets Act 2000 (the "Act") with FCA Firm Reference Number ("FRN") 901069.

This statement describes Montify AML Risk Appetite and provides the framework through which the Business describes the level and types of AML risk that Montify is willing to incur in executing its broader business strategy.

Accepted Business

As a general principle, Montify shall not onboard Customers carrying out businesses or activities that are illegal, conducted in absence of required licenses or permissions, or present an excessive reputational risk for Montify.

Montify will not knowingly conduct business with anyone who has engaged in any criminal activities. Further, Montify will not enter into a business relationship and will not process the payment flows with prohibited parties for the following:

- Exact matches on Sanctions lists
- Shell Banks
- Shell Companies
- Unregistered Money Service Businesses ("MSBs")
- Parties that are not transparent
- Bearer share corporations and companies
- Groups, legal bodies or similar subject to international sanctions or embargoes
- Offshore holding/investment companies

Prohibited business types

Please see prohibited business types that are not supported by Montify:

- Collecting donations as a charity or non-profit organization, NGO's;
- Dating;
- Drug paraphernalia - product or accessory that is intended or modified for making, using, or concealing drugs, typically for recreational purposes;
- Drugs / Illicit substances, steroids, and certain controlled substances or other products that present a risk to consumer safety;
- Encourage, promote, facilitate or instruct others to engage in illegal activity;
- File hosting/sharing and cyberlockers;



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- Businesses that Infringe any duly registered copyrights/trademarks or other violation of intellectual property rights;
- Unregulated pharmaceuticals, illegal drugs and or unlicensed drug-related activity;
- Involve offering or receiving payments for bribery or corruption any form of high yield financial investments (get rich quick schemes);
- Items that encourage, promote, facilitate or instruct others to engage in illegal activity;
- Oil & Gas Industries;
- Pyramid or Ponzi schemes;
- Relate to the sale of dangerous or hazardous goods;
- Replicas;
- Sale of government ID's or documents;
- Scottish LP, LLP;
- Services associated with prostitution, escort;
- Shell banks and shell companies;
- Stolen goods including digital and virtual goods (fictitious social media likes, spam emails);
- Violate any law, statute, ordinance or regulation;
- Weapons, firearms, and ammunition;
- Activities involving ferrous, non-ferrous, or precious/rare metals, precious stones, jewelry, works of art.;
- Adult services (*sale of goods, websites, etc.*);
- Binary options (*only companies that have a gambling license can be reviewed for the approval*);
- ICO / Tokens;
- Insurance;
- legal practice or notary practice;
- Crypto exchanges and wallets;
- Forex (except UK, EU regulated);
- EMI, PSP, FI.

Not acceptable Countries:

- | | | |
|---------------|------------------|------------|
| ➤ Afghanistan | ➤ American Samoa | ➤ Barbados |
| ➤ Albania | ➤ Angola | ➤ Bahamas |
| ➤ Algeria | ➤ Aruba | ➤ Belize |



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- Bermuda
- Botswana
- Bosnia and Herzegovina
- Bolivia
- Bouvet Island
- Burundi
- Burkina Faso
- British Indian Ocean Territory
- Brunei
- BVI
- Cambodia
- Cameroon
- Cayman Islands
- Cabo Verde
- Central African Republic
- Cuba
- Congo
- Congo, Democratic Republic
- Comoros
- Cook Islands
- Curacao
- Crimea
- Dominica
- Dominican Republic
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Ethiopia
- Faroe Islands
- Fiji
- Gambia
- Gaza Strip
- Ghana
- Gibraltar
- Grenada
- Guinea
- Guinea-Bissau
- Guam
- Guatemala
- Guernsey
- Guyana
- Haiti
- Iran
- Iraq
- Isle of Man
- Jamaica
- Jersey
- Kenya
- Kuwait
- Kosovo
- Laos
- Lebanon
- Libya
- Mali
- Marshall Islands
- Morocco
- Monaco
- Mongolia
- Montserrat
- Myanmar (Burma)
- Mozambique
- Nauru
- Nicaragua
- Nigeria
- Niger
- Niue
- North Korea
- Oman
- Palau
- Panama
- Pakistan
- Philippines
- Palestine
- Puerto Rico
- Samoa
- Somalia
- South Sudan
- Sudan
- Syria
- Seychelles
- Sierra Leone
- Sri Lanka
- St Kitts & Nevis
- St Maarten
- St Vincent & Grenadines
- Swaziland
- Trinidad & Tobago
- Tunisia
- Turkmenistan
- Turks & Caicos
- Uganda
- Uruguay
- USA
- US Virgin Islands
- Vanuatu
- Venezuela
- West Bank
- Yemen
- Zambia
- Zimbabwe



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Sources:

European Commission; European Parliament and the Council - list of high-risk third countries with strategic deficiencies.

Consolidated List of European Union Financial Sanctions (EU sanction map).

OFAC (Office of Foreign Assets Control) Sanction Lists.

HM Treasury Sanctions List.

The Financial Action Task Force(FATF) – list of jurisdictions with strategic AML/CFT deficiencies.

<https://www.knowyourcountry.com/>

<https://www.sanctionsmap.eu/#/main>

<http://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/fatf-compliance-june-2019.html>

<https://sanctionssearch.ofac.treas.gov/>

<https://www.gov.uk/government/publications/the-uk-sanctions-list>