



CUSTOMER IDENTIFICATION AND VERIFICATION POLICY

Last revised on March 10th, 2026

Effective this March 10th, 2026, PAY4B LIMITED, with the registered office address at:, Unit 807-130, Spadina Ave., Toronto, Ontario, M5V2L4, Canada, hereinafter referred to as “Company” “we”, “us”, or “our”) is committed to provide services for worldwide users. We have prepared this Privacy policy to describe all rights and obligations of You as our user.

1. INTRODUCTION

This Customer Identification and Verification Policy (“Policy”) is part of the Compliance Program of Pay4B Limited (hereinafter “we”, “us”, or “our”), a registered Money Services Business (MSB) under Ontario Corporation Number 1000707154 and FINTRAC MSB registration No. N300000219 valid until 21st of September 2028 as well as registration No. under RPAA No. RPS0002997.

This Policy ensures compliance with the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and the related regulations and guidelines issued by FINTRAC (Financial Transactions and Reports Analysis Centre of Canada).

2. SCOPE

This Policy applies to all business clients seeking to use our financial services, including both fiat and crypto payment solutions. It covers all parties connected to a legal entity: founders, directors, shareholders ($\geq 25\%$), and ultimate beneficial owners (UBOs).

3. OBJECTIVES

- Prevent and detect money laundering, terrorism financing, and fraud
- Ensure regulatory compliance under Canadian law
- Identify and assess the risk profile of each client
- Establish a consistent and auditable onboarding process

4. IDENTIFICATION REQUIREMENTS

4.1 For Legal Entities

- Legal name, business number, and incorporation jurisdiction
- Certificate of Incorporation
- Articles of Incorporation or Partnership Agreement
- Proof of business address
- Tax Identification Number or CRA registration (if applicable)

4.2 For Directors and Officers

- Full name, date of birth, and nationality
- Government-issued photo ID (passport or driver's license)
- Proof of address (bank statement, utility bill, or lease agreement, ≤ 3 months)

4.3 For Shareholders and Beneficial Owners ($\geq 25\%$)

- Personal identification as above
- Proof of ownership (e.g., shareholder register or company structure chart)
- Source of funds declaration (if required)
- Additional documents in high-risk cases

5. VERIFICATION PROCESS

- Use of government databases and registries
- Document authentication and liveness checks
- Cross-verification with third-party services
- Screening against PEP, sanctions, and adverse media lists

6. RISK ASSESSMENT

Clients are categorized as low, medium, or high risk based on:

- Industry and country of incorporation
- Nature and volume of transactions
- Beneficial ownership structure
- Client reputation and background

Enhanced Due Diligence (EDD) is applied to high-risk entities.

7. RECORD-KEEPING

All identity documents and verification records are retained for a minimum of five (5) years after the business relationship ends, as required by PCMLTFA.

8. ONGOING MONITORING

We perform periodic reviews to ensure the information remains up to date, particularly in the following cases:

- Changes to ownership or management
- Large or unusual transactions
- Adverse media or risk alerts

9. NON-COMPLIANCE

We may refuse or terminate a business relationship if:

- The client fails to provide required information
- False or misleading documents are submitted
- The client poses an unmanageable risk
- Regulatory obligations are not met

10. CONFIDENTIALITY AND DATA PROTECTION

All client data is handled securely and in accordance with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and GDPR for EU residents. Data is used strictly for compliance, risk management, and regulatory reporting.

11. THIRD-PARTY RELIANCE

We may rely on authorized agents or third parties to perform customer identification, provided they comply with applicable regulatory standards and contractual obligations.

12. TRAINING AND REVIEW

All staff involved in onboarding and compliance are regularly trained on:

- KYC/AML procedures
- Document verification
- Risk indicators
- Reporting obligations under FINTRAC

This Policy is reviewed annually and updated as needed.

13. CONTACT INFORMATION

For questions or concerns, please contact us at:

- Email: support@payb.com, info@pay4b.com
- Phone: + 1 (416) 474 37 58
- Mailing Address: Unit 807-130, Spadina Ave., Toronto, Ontario, M5V2L4, Canada

For EU residents, you may also contact our Data Protection Officer (DPO) at:
dpo@pay4b.com