



Sanctions Risk Policy and Procedures

Pay4B Limited

1. INTRODUCTION

This Sanctions Risk Policy and Procedures ("Policy") is a component of the Compliance Program of Pay4B Limited (hereinafter "we," "us," or "our"). This Policy is designed to ensure compliance with all applicable sanctions regulations, including but not limited to those issued by the Office of Foreign Assets Control (OFAC), the United Nations (UN), the European Union (EU), and the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).

2. PURPOSE

The purpose of this Policy is to:

- Prevent engagement in prohibited transactions with sanctioned persons or jurisdictions
- Establish a framework for identifying and mitigating sanctions risk
- Ensure compliance with global sanctions regimes
- Promote due diligence and screening procedures across all business activities

3. SCOPE

This Policy applies to all employees, contractors, officers, directors, and agents of Pay4B Limited. It covers all business relationships and transactions, including those involving fiat and crypto assets, financial services, and partnerships.

4. SANCTIONS SCREENING

We conduct sanctions screening during onboarding and throughout the business relationship. Screening is performed against:

- OFAC Specially Designated Nationals (SDN) and Blocked Persons List
- UN Consolidated List

- EU Consolidated Sanctions List
- Canada's Consolidated List

Screening is also conducted against commercially available databases to identify PEPs, adverse media, and entities with indirect exposure to sanctioned parties.

5. RISK ASSESSMENT

We perform regular risk assessments to:

- Identify high-risk countries, sectors, and clients
- Assign risk ratings based on exposure to sanctions regimes
- Implement enhanced due diligence (EDD) for high-risk cases

EDD measures may include:

- In-depth background checks
- Independent verification of counterparties
- Legal review of contract terms

6. ESCALATION AND REPORTING

Any sanctions-related red flags are immediately escalated to the Compliance Officer. If a match is confirmed, we:

- Block the transaction
- Freeze relevant assets
- Report to the appropriate regulatory authority (e.g., FINTRAC, OFAC)

7. THIRD-PARTY MANAGEMENT

We assess the sanctions compliance policies of third parties, including agents and partners. Contracts include clauses requiring adherence to our sanctions standards.

8. TRAINING AND AWARENESS

All relevant personnel are trained regularly on sanctions laws, screening tools, red flags, and escalation procedures. Training is updated in line with changes to applicable regulations.

9. RECORD-KEEPING

Records of sanctions screening, risk assessments, escalations, and reports are retained for a minimum of five years in accordance with FINTRAC and other legal requirements.

10. POLICY REVIEW

This Policy is reviewed annually and updated as required to reflect changes in the regulatory environment and business operations.

11. 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