

# Policy on Anti-Money Laundering/Counter-Terrorist Financing Measures and Economic Sanctions Compliance

Our company, as a funds transfer service provider offering international remittance services, is committed to providing our customers with safe and convenient services. At the same time, we recognize that it is our significant social responsibility to contribute to the maintenance of a sound financial system by preventing money laundering, terrorist financing, and criminal organization involvement (hereinafter collectively referred to as “AML-related issues”), as well as by combating violations of economic sanctions related to the Foreign Exchange and Foreign Trade Act (hereinafter referred to as the “Foreign Exchange Act” ).

Based on this recognition, our company and group companies regard compliance with AML-related laws and regulations, as well as the Foreign Exchange Act, as one of the highest priorities in our management strategy, and we are strengthening countermeasures across all levels of the organization. AML-related and sanctions violation risks are becoming increasingly sophisticated and complex, raising concerns about potential criminal misuse of our services.

- To address these challenges appropriately and achieve a balance between compliance with legal requirements and the protection of our customers, we are advancing the following measures:
- Formulating policies at the management level and building company-wide control frameworks
- Reviewing rules, regulations and Terms of Use Agreement to reflect international requirements and changing environments
- Conducting regular risk assessments and implementing risk mitigation measures based on a risk-based approach (RBA)

- Conducting appropriate customer due diligence (CDD), including the use of data on sanctioned persons and politically exposed persons (PEPs), and ensuring ongoing customer monitoring
- Implementing effective transaction monitoring using automated systems
- Detecting suspicious transactions or activities and promptly reporting them to authorities
- Strengthening efforts to protect stakeholders from fraud and misuse
- Enhancing education and training programs for all officers and employees on AML-related and sanctions violation risks
- Pursuing sustainable development through collaboration and cooperation with various stakeholders

To verify the effectiveness of these measures and further improve our control frameworks, we also conduct regular independent audits by external professionals. Moving forward, we will continue to strive as a united organization to remain a trustworthy funds transfer service provider.

Last modified: April 3, 2023

Digital Wallet Corporation