



# Prohibited Business Policy

Avital Swiss Invest AG

24th February 2025

# 1. Introduction

Avital Swiss Invest AG (hereafter: “Avital”) is committed to ensuring compliance with all applicable legal, regulatory, and ethical standards, as well as the rules and restrictions imposed by its correspondent banks and banking service providers.

To maintain the integrity of our payment services and protect against financial crime risks, we prohibit, inter alia, certain business activities that are illegal, high-risk, or contrary to our risk appetite.

This policy outlines the types of businesses, activities, and transactions that are prohibited from using our services.

# 2. Prohibited Financial Transactions

Avital strictly prohibits engaging in any transactions, business activities, or relationships that involve or facilitate:

- Fraud
- Tax evasion
- Terrorism financing
- Any other activities classified as money laundering or financial crime

# 3. Prohibited Persons and Entities

Avital strictly prohibits processing payments for businesses or individuals involved in any of the following and does not enter into any business relationships with such persons or entities:

- Listed on relevant international sanctions lists
- Included on our internal blacklist
- Listed on the internal blacklists or policies of our correspondent banks or banking service providers (to the extent that we are aware of them).

## 4. Prohibited Countries and Regions

Avital strictly prohibits processing payments for businesses or individuals involved in any of the following and does not enter into any business relationships with such persons or entities:

- Listed on relevant international sanctions lists
- Included on our internal blacklist
- Listed on the internal blacklists or policies of our correspondent banks or banking service providers (to the extent that we are aware of them)
- FATF high-risk and under increased monitoring jurisdictions are strictly prohibited.

## 5. Prohibited Industries and Activities

Avital strictly prohibits processing payments for businesses or individuals involved in any of the following activities:

### 5.1. Illegal and Unethical Activities

- Money laundering, Terrorist financing, Ransomware, and other financial crimes.
- Fraudulent, deceptive, or misleading business practices.
- Human trafficking, forced labor, or the exploitation of individuals.
- Illegal trade, poaching, or exploitation of protected or endangered wildlife and their derivatives.
- Sale, distribution, or promotion of counterfeit goods.
- Firearms, explosives and other harmful or dangerous materials. Guns, gunpowder, ammunition, weapons, fireworks and other explosives.
- Pyramid schemes, Ponzi schemes, or multi-level marketing programs.
- Illegal streaming, distribution, host, or facilitate access to copyrighted content without proper authorization or licensing, including movies, TV shows, sports broadcasts, and others.

### 5.2. Unlicensed and High-Risk Financial Activities

- Unlicensed pharmaceutical and drugs selling businesses.
- Unlicensed gambling, betting, or lottery services.
- Unlicensed Money Service Businesses (MSBs) – transmitters, currency exchangers, or remittance services without the required regulatory licenses.
- Unlicensed Payment Facilitators - payment processing or facilitation services without proper authorization or regulatory approval.

- Unlicensed financial services, including unregulated securities broker-dealer, forex trading, bonds, or investment products or platforms.
- Privacy coins or other anonymous cryptocurrency transactions or products.
- Cryptocurrency tools which promote anonymity such as mixers, or tumblers.
- Unlicensed Security Tokens offerings or other unlicensed tokens issuers.
- Unlicensed cryptocurrency exchanges or other platforms, or in jurisdictions with lax compliance.

### 5.3. Financial institutions with lax compliance

- Financial institutions in prohibited jurisdictions.
- Financial institutions which are Shell banks or any form of Shell investment houses.
- Financial institutions providing anonymous bank accounts, numbered accounts, fictional names.

### 5.4. High-Risk Goods and Services

- Sale of illegal drugs, prescription medications without a license, or drug paraphernalia.
- Weapons, firearms, ammunition, or other explosives.
- Illegal or unlicensed marijuana and cannabis, cbd oil, and other related products.
- Sale or distribution of stolen goods.
- Businesses that primarily operate with large volumes of cash transactions.
- Businesses involved in transporting, handling, or storing large amounts of cash.
- Businesses engaged in the trade, storage, or processing of precious metals, scrap metals, or other businesses dealing with high-risk cash transactions.

### 5.5. Adult Content and Services

- Adult entertainment services, including live cams and escort services.
- Sale of sexually explicit content involving minors or non-consensual acts.
- Mail-order bride services.

### 5.6. Sanctions and Prohibited Jurisdictions

- Business relationships or transactions with entities or individuals listed on sanctions lists, subjected to trade embargoes, or otherwise prohibited by our policies or risk matrix.
- Prohibited Countries and Regions.

### 5.7. Other prohibited activities

- Non-Profit Organizations and Charities - Opaque or High Risk NGOs

## 6. Enforcement and Monitoring

Avital reserves the right to:

- Reject applications from prohibited businesses.
- Terminate business relationships that violate this policy.
- Report suspicious activities to regulatory authorities as required by law.

This policy is subject to periodic review and may be updated to reflect regulatory changes.