

# YouGo Limited

## Anti-Money Laundering Policy

July 1, 2025

**YouGo Limited** is a company incorporated in Hong Kong, with the company registration number s with its registered office at Rm 602, 6/F, Kai Yue Comm Building, No.2c, Argyle Street, Mongkok Kowloon, Hong Kong (hereinafter referred to as **YouGo**). YouGo recognizes the importance of preventing money laundering and terrorism financing and is committed to the highest standards of Anti-Money Laundering and Combating Terrorist Financing (“AML/CTF”).

For the purposes of good practice and in order to meet the applicable requirements of the Serbian law, YouGo establishes specific internal policies and procedures. This Policy establishes standards which every employee, contractor and business partner of YouGo should adhere to.

### 1. Scope

Money Laundering is the process of any activity by which criminally obtained money or other assets (criminal property) are exchanged for “clean” money or other assets with no obvious link to their criminal origins.

Money laundering is usually represented by the form of abuse of the financial system using assets (e.g. cash, cryptocurrency, tokens) stemming from a criminal offence such as drug trafficking, corruption, or other criminal act in order to conceal their criminal origin: the assets derived from illegal activity are introduced into the legitimate financial system with the purpose to hide their true origin generally through conducting a series of related transfers or transactions (including purchase or sell of tokens), eventually having the assets appear to be legitimate.

Terrorism Financing supposes direct financing or providing financial support to terrorist or organized group of terrorists; it generally refers to the process of raising, storing and moving assets that could potentially be received through either illegal and/or legal activity, in order to directly facilitate commitment of terrorist acts and/or sustain the organizational structure of a terrorist organization. Terrorism financing could be divided into two categories: (1) direct funding of terrorist activity (e.g. facilitating the purchase of weapons); and (2) indirect funding of terrorist organizations (e.g. providing financial support to organization known to support a terrorist group). In contrast with money laundering assets designated for financing of terrorism are commonly used in the name of religious or ideological purpose rather than just to hide criminal origin of the assets.

This Policy is aimed to prevent (i) any company or individual from using YouGo for money laundering or terrorist financing activities and (ii) YouGo from violation of applicable laws.

### 2. AML Framework

This Policy aimed to assist YouGo and its employees to be in line in any material respects with laws and regulations that may be applicable and thereby mitigate related legal, regulatory and reputational risks.

YouGo and its employees are (i) prohibited from engaging in or facilitating money laundering, terrorist financing or other suspicious activity, and (ii) required to exercise a due level of care and diligence when dealing with third parties to avoid being willfully blind or otherwise complicit in money laundering, terrorist financing or other suspicious activity. In full compliance with this, YouGo must conduct business only with individuals and organizations whose identity has been established, as appropriate.

#### 2.1. Key principles of the YouGo AML Policy

The key principles of the YouGo AML Policy are:

- take all reasonable measures to combat money laundering and terrorist financing through the prevention, detection and reporting of unusual or suspicious behavior;
- prevent the YouGo business channels/products/services from being used as a channel for money laundering or terrorism financing;
- identify the customer and verify customer’s identity, using reliable, independent source documents, data or information;

- maintain robust record keeping procedures to ensure the retrieval of relevant information without undue delay when required to do so; and
- cooperate with and support of regulators and law enforcement agencies in their efforts to prevent, detect and control financial crime and terrorism financing.

YouGo and its employees are prohibited from engaging in or facilitating money laundering or terrorist financing-related activities, including but not limited to:

- accepting assets that are known or suspected to be the proceeds of criminal activity, including tax offences;
- assisting customers in activities intended to breach their tax obligations;
- engaging in business relationships, directly or indirectly, with terrorists, criminals or their financiers; and
- engaging in business relationships with sanctioned persons or entities.

## 2.2. Customer Due Diligence

YouGo employees must identify and verify the identity of new clients and, where appropriate, establish the identity of legal entity and/or individual on whose behalf client is acting when dealing with YouGo prior to engaging in relationship with new client. It is the responsibility of YouGo employees to collect customer identification information and to escalate and report any suspicious client activity or behavior to the Head of Client Onboarding.

To meet this requirements YouGo developed “Know Your Client” Policy.

In order to adhere to global standards of customer due diligence YouGo reserves the right to delegate to a third party the functions of identifying the customer, verifying the customer’s identity and screening the customer with the purpose to determine any potential risk of being involved in any AML/CTF- or sanctions-related issues associated with the customer. Notwithstanding mentioned above ultimate responsibility for customer due diligence remains with YouGo.

## 2.3 Prohibited Relationships and Activities

YouGo will not engage in business activities with the following type of customers:

- anonymous individuals;
- individuals or companies included in any official lists of sanctions;
- individuals or companies indicating possible involvement in criminal or terrorism related activities, based on available information about them; and
- individuals or companies refusing to provide the required information or documentation.

YouGo fully recognizes global standards in regulating of virtual currency and cryptocurrency and strives to be in compliance with applicable laws, rules and regulations in all countries where YouGo operates.

## 2.4 Records Keeping

Customers identification data and documentation can be submitted to YouGo in electronic form. Appropriate records of the received identification data and/or documentation of customers (“**Records**”), must be kept and stored in YouGo Database.

YouGo is committed to high standards of personal data protection and uses best endeavors to keep Records secure and protect personal information of clients. To comply with these standards YouGo designed YouGo Electronic Database in order to ensure that Records are preserved during the applicable retention period and have to be retrievable on a timely basis when needed. The Head of Client Onboarding is responsible for retaining and storing of Records in accordance with this Policy, applicable laws and regulations.

## 2.5 The Head of Client Onboarding

The Head of Client Onboarding is responsible for:

- coordinating and managing of AML/CTF-related issues and risks;
- advising YouGo employees on AML/CTF-related issues and risks;
- managing legal and reputational risks associated with money laundering and terrorist financing;
- performing risk assessments;

- interacting with respective authorities on AML/CTF-related questions;
- providing YouGo and its employees with AML/CTF training;
- designing, implementing and overseeing AML/CTF processes and procedures; and
- retaining and storing of Records in a proper way.

The Head of Client Onboarding has the right to refuse to provide services to any customer who based on his/her own opinion is suspected in facilitating money laundering, terrorist financing or otherwise doesn't meet the requirements of this Policy. Where the Head of Client Onboarding determines that the acceptance of relationship with a customer would breach this Policy or applicable laws and regulations, the decision of the Head of Client Onboarding is final. The Head of Client Onboarding is also responsible for ensuring that YouGo employees comply with this Policy, applicable laws and regulations.

## **2.6 Reporting Suspicious Activity**

YouGo expects that, if any employee, contractor or business partner becomes aware of any money laundering, terrorist financing or other unusual or suspicious activity, this is reported within a reasonable time period to the Head of Client Onboarding.

A report on suspicious activity should contain, at least, the following information, which will be reviewed by the Head of Client Onboarding:

- identity of the person raising the report;
- date of the report;
- individual or company which is suspected of money laundering or terrorist financing activities;
- other individuals or companies involved otherwise;
- deliverance of facts;
- source of information about potential suspicious activity;
- what is suspected and why; and
- any possible involvement of YouGo.

The Head of Client Onboarding may make reasonable enquiries within YouGo or request additional information from the customer in order to investigate escalated report and assess the potential risk of money laundering and terrorist financing with such customer. Based on the results of this assessment, the Head of Client Onboarding will determine whether or not it is necessary to file an official report to the responsible authorities. In all cases, YouGo employees are prohibited from disclosing information regarding the suspicious activity and any decisions concerning whether or not to make a report to any customer or third party.

## **2.7 Sanctions, Sensitive Countries and Sensitive Parties**

YouGo and its employees are required to comply with all applicable sanctions laws and regulations in the countries in which YouGo conducts business. Conducting a business relationship or transaction in breach of sanctions, may subject YouGo and its employees involved to reputational harm.

YouGo has taken strong measures intended to mitigate or eliminate the exposure to sanctioned countries, entities and individuals. It is the responsibility of all YouGo employees to understand and comply with the prohibitions and requirements set by this policy.

YouGo reviews political, regulatory and economic developments globally to identify and attempt to reduce the risks associated with conducting business involving certain countries, individuals and entities. As a result, YouGo may refuse to establish relationship with those individuals and entities.

The current list of countries YouGo is restricted from engaging in business with:

- Iran
- Syria
- Cuba
- Crimea
- North Korea
- Sudan

YouGo is also restricted in dealing with any individual domiciled in any of mentioned above countries or legal entity organized under the law of any of those countries.