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List of Prohibited Businesses

V1.2

External

February 2023

Internal / External: PUBLIC

Version : v1.2

Last updated : 2021-11-01

Railsbank Technology Ltd, trading as "Railsr" is a company incorporated in England and Wales with Company N° 10076912. Its registered address is 1 Snowden Street, London, EC2A 2DQ, UK.
Its VAT N° is GB 243 677 291.

VERSION CONTROL

Version Date	Version	Issued Brief Summary of Change	Approved by
25th February 2020	V1.0	Policy created	Management Board, coordinated with MLRO
31th January 2022	V1.1	Policy updated	MLRO UK, MLRO LT, Risk Committee
7th July 2022	V1.2	Changed the wording of the Annex. Clarifying the terms "customer" and "end-user" and the clarification on the risk level "restricted", added CBD as restricted	MLRO LT, MLRO UK

APPROVED AT BOARD MEETING DATED: 2022-07-08

Scope of Policy

Policy applies to all customers of PayrNet Ltd and UAB PayrNet.

As part of our business relationship, we inform you that our risk policy requires us to monitor and exclude certain businesses.

We kindly request that you read the requirements below and ensure that all endusers and payment flows through Railsbank Group's regulated firms (PayrNet Limited & UAB PayrNet) and bank partners comply with these requirements.

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PayrNet Intermediaries (Agents or Distributors) cannot be conducting the below types of businesses:

PayrNet Prohibited Business (Direct customers)	Type	Risk Level
Cryptocurrency trading or other Cryptocurrency businesses	Crypto	Prohibited
Anonymous or Numbered Accounts, Shell Banking Financial Services	Financial Services	Prohibited
Cash and Cheque Handling: Cheque Cashing, Deposit Taking, Cash Transfer Financial Services	Financial Services	Prohibited
Credit repair, Debt Restructuring	Financial Services	Prohibited
Debt recovery, Debt settlement, Debt Collections	Financial Services	Prohibited
Financial Pyramid or Ponzi Schemes	Financial Services	Prohibited
Lottery, Gambling and Gaming, including payouts	Financial Services	Prohibited
MSBs/PSPs with agents and sub agents	Financial Services	Prohibited
Any industry known to be an illegal industry in its local jurisdiction	Illegal Services	Prohibited
Illegal Drugs and Narcotics	Illegal Services	Prohibited
The sale or distribution of stolen goods (including digital and virtual goods), counterfeit goods and violation of intellectual property, or items that violates individual privacy (revenge porn)	Illegal Services	Prohibited
Any products harmful to human health - tobacco, e-cigarettes and e-liquid (pharmacological products are subject to PayrNet approval)	Other Services	Prohibited
Operating a business that requires a license or special permit without obtaining such license (i.e. Unregulated Auction Houses)	Other Services	Prohibited
Production of Adult or Violent content	Other Services	Prohibited
Production or Distribution of Offensive Weapons: Ammunition, Firearms, Explosives, Complex Weapons (i.e. guided missiles), Poisons	Other Services	Prohibited
Psychic services	Other Services	Prohibited
Selling, hosting, distributing, producing or promoting offensive materials, including materials that incites or promotes racial hatred or discrimination based on gender, race, religion, national origin, physical ability, sexual orientation, or age	Other Services	Prohibited
Transactions involving Human Organs	Other Services	Prohibited
Sanctioned individuals and entities	Sanctions	Prohibited

End-users (customers of PayrNet's Intermediaries) cannot be conducting the below types of businesses:

PayrNet Prohibited Business (End-users)	Type	Risk Level
Cryptocurrency trading or other Cryptocurrency businesses [1]	Crypto	Restricted
Anonymous or Numbered Accounts, Shell Banking Financial Services	Financial Services	Prohibited
Cash and Cheque Handling: Cheque Cashing, Deposit Taking, Cash Transfer Financial Services	Financial Services	Prohibited
Credit repair, Debt Restructuring	Financial Services	Prohibited
Debt recovery, Debt settlement, Debt Collections	Financial Services	Prohibited
Financial Pyramid or Ponzi Schemes	Financial Services	Prohibited
Lottery, Gambling and Gaming, including payouts [2]	Financial Services	Restricted
Financial institutions (e.g. MSBs, PSPs or EMIs, etc)	Financial Services	Prohibited
Any industry known to be an illegal industry in its local jurisdiction	Illegal Services	Prohibited
Illegal Drugs and Narcotics	Illegal Services	Prohibited
The sale or distribution of stolen goods (including digital and virtual goods), counterfeit goods and violation of intellectual property, or items that violates individual privacy (revenge porn)	Illegal Services	Prohibited
Any products harmful to human health - tobacco, e-cigarettes and e-liquid, CBD products (pharmaceutical products are subject to PayrNet approval)	Other Services	Restricted
Operating a business that requires a license or special permit without obtaining such license (i.e. Unregulated Auction Houses)	Other Services	Prohibited
Production of Adult or Violent content	Other Services	Prohibited
Production or Distribution of Offensive Weapons: Ammunition, Firearms, Explosives, Complex Weapons (i.e. guided missiles), Poisons	Other Services	Prohibited
Psychic services	Other Services	Prohibited
Selling, hosting, distributing, producing or promoting offensive materials, including materials that incites or promotes racial hatred or discrimination based on gender, race, religion, national origin, physical ability, sexual orientation, or age	Other Services	Prohibited
Transactions involving Human Organs	Other Services	Prohibited
Sanctioned individuals and entities	Sanctions	Prohibited
Dealers in precious metals and stones	Other Services	Prohibited

[1] Except the Intermediaries of PayrNet that meet requirements of PayrNet Cryptoasset Customer Compliance policy (ex. has a separate legal entity that provides crypto-related services) and fall within PayrNet's risk appetite according to their risk assessment result.

[2] Except in low-risk and highly controlled cases approved by PayrNet's MLRO.