

## **Prohibited Industries and Transaction Types**

In accordance with applicable laws / regulations, partner bank requirements, and/or network requirements, Onbe is prohibited from partnering with clients engaged in certain industries / transaction types. As Onbe conducts initial due diligence on new clients and periodic due diligence of current clients, reference will be made to the list below to determine whether clients are engaged in any of these prohibited industries. Any new or current client associated with the industries / transaction types listed below will be declined from conducting business with Onbe. For current clients, this also means immediate shutdown of tokens and in market cards, as well as ordering capabilities.

Below is a list of high-level categories of 'prohibited' industries and transaction types. In general, these are prohibited across the board, however Onbe conducts internal reviews to determine if certain industries / transaction types may be acceptable bank by bank.

Refer to the **Appendix** for more details.

No.	High-Level Category	
1	Adult Content and Services	
2	Alcohol, Tobacco and Firearms	
3	Consumer Protection	
4	<u>Drugs</u>	
5	Financial Crimes, High-Risk Jurisdictions and Persons	
6	Financial Products and Services	
7	Gaming/Gambling	
8	Illegal Products and Services	
9	Metals and Precious Stones	
10	Other	

The Prohibited Industries and Transaction Types list is updated periodically to ensure ongoing compliance.



## Appendix: Prohibited Industries & Transaction Types

Below is a list of 'prohibited' industries and transaction types.

No.	High-Level Category	Industry/Transaction Type
1	Adult Content and Services	Adult/pornographic film, content and escort services
	riduit dontent and bet vices	Criminal offenses of a sexual nature (e.g., child pornography, prostitution, etc.)
		Dating services/online dating service/miscellaneous personal services
		Massage parlors (not associated with salons/chiropractic care)
2	Alcohol, Tobacco and Firearms	Ammunition, firearms or certain firearm parts or accessories or certain weapons or knives regulated
	Alconol, Tobacco and Firearms	under applicable law
		Arms manufacturers/dealers
		Firework sales
		Online and in-person tobacco/e-cigarettes/e-liquid sales
		Sellers or distributors of alcohol and firearms
3	Consumer Protection	Clients engaged in any form of deceptive practices including but not limited to: hidden disclosures, bogus claims and endorsements, pre-checked opt-in boxes and refund/cancellation avoidance
		Get rich or illegal pyramid schemes and boiler room/investment/Ponzi scams/multiple level sales/multiple level marketing
		Sales of products or services identified by government agencies to have a high likelihood of being fraudulent; pseudo products
4	Drugs	Cannabidiol products
		Drug paraphernalia
		Hemp Direct Business
		Marijuana industry business or marijuana-related legitimate business/cannabis; Hemp related businesses to the extent that business is engaged in the growing, processing and manufacturing of hemp
		Sale/transfer or distribution of psilocybin mushrooms
		Substances designed to mimic illegal drugs
5	Financial Crimes, High-Risk Jurisdictions and Persons	Any individual or entity that:
		Presents forged or false documents
		Refuses to cooperate or deliberately obstructs the Customer Identification Program,
		Customer Due Diligence and Enhanced Due Diligence process
		Insists on anonymity
		Individuals, countries or entities targeted by Office of Foreign Assets Control regulations and/or have been sanctioned by other regulators
		Legal entities whose Ultimate Beneficial Owners cannot be verified
		Politically Exposed Persons and related entities
		Prospective clients associated with financial crimes like theft, money laundering, financial exploitation, offering or receiving payments for bribery or corruption, etc.
6	Financial Products and Services	Anonymous or numbered accounts or bearer share accounts; corporate entity with bearer
		shareholding in the ownership structure; bearer share companies
		Casa de Cambios/Currency exchange business/Check cashing
		Crypto/virtual currency business, exchanges, dealers and administrators; Virtual asset service
		providers; Cashless Automated Teller Machine, Non-Fungible Tokens
		High-risk and high interest rate loan provider (payday lender)/payday loans
		High-risk securities merchant and markets
		Pawn shop/brokers
		Payable Upon Proper ID transactions
		Payable-Through Accounts
		Payment aggregators outside of Card Brand approved programs
		Prepaid, Demand Deposit Account and Merchant Acquiring clients using tactics to evade Card Brand



No.	High-Level Category	Industry/Transaction Type
		excessive chargeback or fraud monitoring programs
		Prepaid, Demand Deposit Account and Merchant Acquiring clients, principals or related entities previously identified by any Card Brand for deceptive practices or any violation of Card Brand
		Prepaid, Demand Deposit Account and Merchants acquiring clients engaged in activity prohibited by the Card Brands
		Shell banks and/or foreign shell companies
		Transaction types prohibited by Visa/MasterCard/American Express/Discover
		Unlicensed and/or unregistered Money Service Business/Hawala/nested Money Service Business
		Unregistered hedge funds
		Wire funds transfers for non-customers
7	Gaming/Gambling	Digital goods – Games for transactions involving skilled game wagering (e.g. fantasy sports)
	<i>o,</i>	Illegal gambling and unlawful/unlicensed Internet gambling organizations or related activity
		Licensed Internet gambling
		Unregulated domestic/foreign casinos
8	Illegal Products and Services	Any products/services deemed illegal by any level of government
		Entities involved in illegal products or services
		Prospective clients involved in the servicing of illegal goods/services including but not limited to: counterfeit goods / trademark infringement, human trafficking, child labor, etc.
9	Metals and Precious Stones	Radioactive metals
		Raw precious metals, stones and minerals
10	Other	Armed security services
		Carbon credits
		Child adoption
		Choice of law
		Clients upselling or cross-selling products of other Clients and then sharing the customer data with the third-party or receiving customer data from third-parties (Data Pass)
		How to books, newsletters, subscriptions or online access for any industry on this list
		New government funded care
		Online or in-person auction services or websites
		Products/services/organizations promoting hate, racism, violence, harassment, or abuse or extreme political organizations
		Timeshares - Timeshare rentals, leases and sales
		Unlicensed pharmaceuticals
		Unregistered/Unregulated/Non-Governmental Charitable Organizations/Non-Governmental Organizations and those not recognized