

# Sanctions Screening Policy

Ram Fintech s.r.o. · Draft for EMI licensing

Company: Ram Fintech s.r.o. Version: 1.0 (Public Disclosure)

Date: [Enter date]

Legal framework: Act No. 69/2006 Coll. (Sanctions Act) and related EU regulations

## 1. Introduction and Objectives

Ram Fintech s.r.o. (hereinafter referred to as the “Company”) maintains a zero-tolerance policy toward violations of international and national sanctions regimes. Our goal is to ensure that no financial services provided by the Company are made available, either directly or indirectly, to persons, entities, or regimes subject to restrictive measures.

## 2. Scope of the review

The company conducts automated screening of all clients, their ultimate beneficial owners (UBOs), authorized representatives, and counterparties to payment transactions against the following lists:

UN Lists: UN Security Council resolutions concerning the fight against terrorism and the proliferation of weapons of mass destruction.

European Union (EU) Lists: Consolidated list of persons, groups, and entities subject to EU financial sanctions.

OFAC (U.S.) Lists: The SDN (Specially Designated Nationals) Lists and other relevant lists maintained by the U.S. Office of Foreign Assets Control.

Czech Republic National Sanctions List: A list administered by the Ministry of Foreign Affairs of the Czech Republic and monitored by the Financial Analytical Office (FAÚ).

## 3. Frequency and Methodology

To ensure maximum timeliness and alignment with a rapidly changing environment, we have implemented the following mechanisms:

Onboarding Screening: Every potential client is screened in real time during the registration process. A business relationship is not established until a negative screening result is confirmed.

Daily Updates (Daily Delta Screening): Our systems perform a daily automated check of our entire client base against the updated versions of all the lists mentioned above.

Transaction screening: All incoming and outgoing payments are monitored in real time for compliance with sanctions requirements (including checks on IBANs, bank codes, and geographic restrictions).

## 4. Handling Alerts

In the event of a match, the Company proceeds as follows:

Immediate block: The transaction is suspended and access to the account is restricted pending an AML

compliance review by an officer.

Verification: The AML department will analyze whether the result is a true positive or a false positive.

FAÚ Report: If a match with the sanctions list is confirmed, the Company shall immediately (within 24 hours at the latest) notify the Financial Analytical Office of the Czech Republic in accordance with Act No. 69/2006 Coll.

## 5. Geographic restrictions and embargoes

The company does not provide services in jurisdictions that are subject to comprehensive embargoes or are classified as high-risk in terms of money laundering and terrorist financing according to FATF lists. The current list of prohibited countries is managed internally and reviewed on a regular basis.

## 6. Inspections and Audits

The effectiveness of the sanctions system is regularly tested through:

Regular reviews of filter settings and keywords.

Internal audits conducted by the Compliance Department.

Employee training focused on methods of circumventing sanctions.

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