

GCB FINTECH — SANCTIONS POLICY AND RESTRICTED JURISDICTIONS

DOCUMENT CONTROL & METADATA

Platform: GCB Fintech — <https://gcbfintech.digital>
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6. Sanctions Policy and Restricted Jurisdictions

GCB Fintech does not knowingly provide services to, or process transactions for, sanctioned persons, sanctioned entities, prohibited counterparties, sanctioned wallet addresses or comprehensively restricted jurisdictions. Screening may cover customers, beneficial owners, controllers, trustees, protectors, beneficiaries, authorised persons, counterparties, payment chains, wallet addresses and relevant vessels or entities.

Screening may be performed against applicable Canadian, Swedish, European, United Nations, United Kingdom, United States and other sanctions regimes where relevant to the entity, transaction, provider, currency, correspondent or jurisdiction. The applicable list depends on the legal person performing the activity and the transaction's legal and operational nexus.

Restricted jurisdictions and territories are determined using applicable sanctions, export-control, AML/CTF, regulatory, provider and risk-based criteria. The current list must be maintained separately from this policy and reviewed regularly. It should not be hard-coded into a static website document because the list can change.

We may block, freeze, reject, delay or terminate a transaction or relationship where sanctions concerns arise. Assets may be held or dealt with only as permitted by applicable law and any required licence or authority. We do not promise that a blocked transaction will be returned immediately or that a customer will receive details that cannot lawfully be disclosed.

Users must not attempt to route a transaction through a third party, wallet, intermediary, trust, jurisdiction or payment method to avoid sanctions screening or controls. Any potential sanctions match must be escalated to compliance and must not be cleared solely on the basis of a name or address explanation without appropriate verification.