<u>Anti-Money Laundering Safeguards</u>

Money Laundering is unlawful and damaging to our users and the community at large. Zoop has a number of controls in place to prevent, detect, and address potential money laundering on our Platform.

What is money laundering?

Money laundering is the process by which criminals conceal the existence, nature or source of their illegal funds and disguise them to make them appear legitimate. Financers of terrorism and other organized illicit activities follow similar processes. The compliance goal of Zoop is to protect its business from being used to facilitate money laundering, terrorist financing and related crime to the extent reasonably possible. Zoop has assessed the risks posed by money launderers, terrorist financing, and other persons in connection with the Platform. In consideration of the risks posed, and the nature of Zoop's business associated with the Platform, we have implemented various tools, policies and programs to detect and prevent any money laundering activity on our Platform.

How does Zoop address the risk of Money Laundering on the platform?

As part of Zoop's commitment to keeping our community and users safe, we have a dedicated team which specializes in monitoring, detecting and investigating attempts to use the Zoop platform for money laundering. This team utilizes human judgment, as well as in-house technology and accredited third-party tools to identify and investigate any suspicious behavior or transactions.

Examples of these "red flags" which may indicate money laundering can include:

- Multiple payment card attempts with multiple names

- Fast purchases

- Payment attempts from flagged IP addresses

- Users engaging in unusual activity on the Platform

- Unverifiable identification documents

- Purchases from accounts with similar patterns (for e.g., newly created accounts or accounts with bad email domains)

Does money laundering happen often on Zoop's Platform?

No. Due to our stringent KYC (Know Your Customer) identity verification processes, restrictions on transactions entered into including minimum and maximum pricing, daily limits, and other prevention and detection methods used by Zoop, the incidence of money laundering on the Platform is very rare.

If we determine that someone has violated our policies and procedures, or the law, we can identify that individual and remove and exclude the person from the platform. We will also report illegal behavior to the appropriate law enforcement agencies, where appropriate and as mandated by law.

Does Zoop train their team to recognize money laundering?

Yes. The team at Zoop that is responsible for carrying out our Anti-Money Laundering Compliance function and protecting our Platform is continually trained on industry best practices, both by our existing compliance vendors as well as external consulting agencies.

What does Zoop do when it suspects money laundering may be occurring on its platform?

When suspicious activity is detected or reported, Zoop's team will investigate the issue and take all appropriate and necessary steps. The relevant account of the user or transaction may be suspended and/or particular content may be removed until such investigation is completed. We will also escalate such information to the necessary law enforcement agencies to take further appropriate action, as the case may be.

How does Zoop comply with the sanctions regimes?

Zoop complies with all relevant national and international sanctions regimes. We utilize the services of third party suppliers to check relevant databases such as Office of Foreign Assets Controls' (OFAC) *"Specifically Designated Nationals and Blocked Persons*", OFAC non-SDN Lists, European Union sanctions lists, United Nations sanctions list, and UK Her Majesty's Treasury sanctions lists. We comply with all legal obligations if we determine that a potential user, or someone with or for whom the user is transacting with on our Platform, is on a sanctioned list or is from, or engaging in transactions with a person or entity located in, a sanctioned country or region.

Does Zoop work with law enforcement to prevent fraud or money laundering?

Yes. In the event of any illegal activity on our platform, including money laundering or fraud, we will report it to our licensed third-party payment providers and the appropriate enforcement agencies. We will also promptly respond to all government and law enforcement requests about potentially illicit accounts or transactions on our Platform.

Should you have any questions regarding our AML Policy and practices, please contact support@zoopcards.com