Anti-Money Laundering & Counter-Terrorist Financing Policy

Wire Wallet Group Ltd (trading as "WireWallet")

Our regulatory status

Wire Wallet Group Ltd (trading as "WireWallet") is an introducer and boutique payment consultancy. We help prospective clients assess their requirements and support their onboarding to regulated Electronic Money Institutions and Payment Institutions authorised in the EU/EEA ("Partner Institutions").

Wire Wallet is not itself a licensed or supervised financial institution, does not provide regulated payment services, does not issue e-money, does not open or operate payment accounts, and does not hold or safeguard client funds. Statutory customer due diligence (CDD), ongoing transaction monitoring, and suspicious activity reporting to the relevant Financial Intelligence Unit are carried out by our Partner Institutions, under their own licences and in accordance with the AML/CFT laws applicable to them.

Notwithstanding the above, Wire Wallet voluntarily applies AML/CFT standards, described below, that are designed to mirror the standards expected of our regulated Partner Institutions. We do this because it reflects how we want to run our business, not because we are legally required to as an unregulated introducer.

Our voluntary AML/CFT commitment

Wire Wallet is committed to combating money laundering and terrorist financing, and to ensuring that our introduction and consulting services are not misused for these purposes, for other financial crime, or to benefit any person or entity subject to international sanctions.

We apply a risk-based approach: the level of pre-screening we apply to a prospective client is proportionate to the money-laundering and terrorist-financing risk that client and their intended activity appear to present, based on factors including their jurisdiction, business sector, ownership structure, and the products they seek.

Pre-screening / triage

Before referring a prospective client to a Partner Institution, Wire Wallet carries out preliminary, introductory-level checks, which may include:

- Collecting basic identity and business information to assess apparent eligibility for our Partner Institutions' products.
- Screening against publicly available sanctions and, where available, adverse-media sources.
- Screening for apparent Politically Exposed Person (PEP) status.
- An initial assessment of whether the prospective client's stated business activity falls within our Partner Institutions' risk appetite.

This pre-screening is preparatory in nature and does not constitute, and should not be relied upon as, the statutory customer due diligence required under applicable AML/CFT law. Full CDD, identity verification, beneficial ownership verification, and ongoing monitoring are performed independently by the relevant Partner Institution as part of its own regulated onboarding process, and a prospective client's acceptance by Wire Wallet does not guarantee onboarding by a Partner Institution.

Sanctions

Wire Wallet has no risk appetite for establishing or supporting a relationship with any natural or legal person designated on:

- the United Nations Security Council Sanctions List;
- the Consolidated List of European Union Financial Sanctions;
- sanctions lists administered by the U.S. Office of Foreign Assets Control (OFAC), including the SDN List;
- any other applicable sanctions list.

We pay particular attention to jurisdictions identified by the Financial Action Task Force (FATF) as high-risk or subject to increased monitoring.

Prohibited activity

We will not knowingly refer, and will terminate engagement with, any prospective client who:

- is subject to, or whose activity would involve, a breach of applicable money-laundering or terrorist-financing law;
- appears to be using or seeking to use our services or a Partner Institution's services for money laundering, terrorist financing, tax evasion, or other financial crime;
- refuses to provide information reasonably requested to complete our pre-screening or a Partner Institution's onboarding process;
- is designated on a sanctions list referenced above.

Legal framework we align with

Although Wire Wallet is not an obliged entity, our voluntary programme is designed with reference to:

- Directive (EU) 2015/849 (4th AML Directive), as amended by Directives (EU) 2018/843 and 2018/1673, and subsequent EU AML/CFT legislation;
- the Cyprus Prevention and Suppression of Money Laundering Activities Law of 2007 (Law 188(I)/2007), as amended;
- FATF Recommendations.

Governance

This policy is approved and reviewed by Wire Wallet's management. Staff involved in client-facing pre-screening receive periodic training on identifying red flags for money laundering, terrorist financing and sanctions risk. Records of pre-screening checks are retained in line with the retention periods set out in our Privacy Policy.

Contact

Questions regarding this policy can be directed to compliance@wire-wallet.com.

Review

This policy is reviewed at least annually or upon any material change to our business model or applicable law.

Last Updated: July 2026.