

Risk mitigation

In the course of business relationships with customers, our company uses monitoring and analysis for the fraud prevention. In cases of suspicion regarding money laundering or terrorist financing, we will request from the customer to submit additional documentation or provide the KYC documents even if they have not yet reached their transaction limits. A22 will perform reviews on all customers every year, including updates on the CDD information and analysis of transaction activity. In some cases, it will take place more than once a year.

Sanctions The Monitoring is inclusive of, but not limited to:

- UN Consolidated- United Nations
- UN Security Council List of Designated Vessels- United Nations
- OFAC Consolidated List- United States
- European Union Sanctions List- European Union
- European Council List of Designated Vessels- European Union
- European Council Restrictive Measures on Russian Entities- European Union
- HM Treasury List- United Kingdom
- Canada OSFI Entity List- Canada
- Canada OSFI Person List- Canada
- Canada's Freezing Assets of Corrupt Foreign Officials- Canada
- Public Safety Canada Listed Entities- Canada
- Special Economic Measures Act – Sanctions- Canada
- Canadian Sanctions Justice for Victims of Corrupt Foreign Officials Act -Canada
- DFAT Australia List- Australia
- France Liste Unique de Gels- France
- Federal Public Service National Financial Sanctions- Belgium
- Liste des Sanctions Financières Internationales- Luxembourg
- Swiss SECO List- Switzerland
- Swiss Federal Council Freezing of Foreign Illicit Assets(Ukraine, Tunisia) -Switzerland
- Singapore MAS List- Singapore
- Singapore First Schedule of the Terrorism (Suppression of Financing) Act- Singapore
- India Ministry of Home Affairs Banned Organisations- India
- Israel Ministry of Defence- Israel
- Russian ROSFIN Monitoring List- Russia
- Ukraine State Financial Monitoring Blacklist- Ukraine
- Norway Lovdata Judicial Laws- Norway
- Monaco Ministerial Orders- Monaco
- Sanction Netherlands Domestic Terrorist List- Netherlands
- US State Department Nonproliferation Sanctions- United States
- US Department of State Terror Exclusion List- United States
- US Department of State Cuba Restricted Entities List- United States
- Japan Ministry of Finance Sanctions- Japan
- Japan METI - Weapons of Mass Destruction Proliferators- Japan
- Philippines AMLC Sanctions Resolutions- Philippines
- New Zealand Police Designated Terrorists- New Zealand
- Australian National Security Terrorism List- Australia
- Thailand Designated Persons List- Thailand
- Kenyan Gazette - Sanctioned Entities- Kenya Warnings and Regulatory Enforcement Africa

- Economic and Financial Crimes Commission Warnings and Convictions - Nigeria
- Nigeria Securities Exchange Commission- Nigeria
- South Africa Police Service- South Africa
- African Development Bank Debarment and Sanctions- South Africa
- Mauritius Independent Commission Against Corruption- Mauritius Asia-Pacific
- Australian National Security Terrorism List- Australia
- Australia ARPA Disqualifications- Australia
- Australia ASIC Notices- Australia
- Australia Disqualified Officers- Australia
- ASIC Disqualified Organisations- Australia
- China Securities and Futures Commission Enforcements- China
- China Banking Regulatory Commission Administrative Penalties- China
- Warnings China Economic Fugitives- China
- China Hong Kong Securities and Futures Commission Alert List- China
- Hong Kong Most Wanted- Hong Kong
- Hong Kong Monetary Authority- Hong Kong
- Hong Kong Securities Futures Commission- Hong Kong
- CBI Wanted List- India
- Security and Exchange Board Enforcement- India
- India NIA Most Wanted- India
- India CBI Reward List- India
- India CBI Red Yellow List- India
- India Competition Commission- India
- Japan Financial Services Agency- Japan
- Japan Financial Services Agency list of Unregistered Financial Trading Companies- Japan
- Bank Negara Malaysia Enforcement Actions- Malaysia
- Malaysia Securities Commission Compounded Cases- Malaysia
- Malaysia Securities Commission Administrative Actions- Malaysia
- Malaysia Securities Commission Criminal Prosecutions- Malaysia
- Securities Commission Malaysia – Sanctions- Malaysia
- Bank Negara Malaysia - Invalid Licenses- Malaysia
- Bank Negara Malaysia - Companies receiving Warning Letters- Malaysia
- New Zealand FMA- New Zealand
- New Zealand Police- New Zealand
- New Zealand Putea Matua Reserve Bank- New Zealand
- New Zealand Serious Fraud Office- New Zealand
- Philippines Police Most Wanted- Philippines
- Philippines Securities and Exchange Commission- Philippines
- Singapore Police Force- Singapore
- Singapore Monetary Authority Investor Alerts- Singapore
- Thailand Securities and Exchange Commission- Thailand Europe and Middle East
- Special Inspector General For Afghanistan Reconstruction- Afghanistan
- Albania State Police Wanted- Albania
- Austria FMA Investors Warnings List- Austria
- Azerbaijan Most Wanted- Azerbaijan
- Belgium Federal Police Wanted- Belgium
- Court of Bosnia and Herzegovina Cases- Bosnia and Herzegovina
- Cyprus Securities and Exchange Commission Warnings- Cyprus
- Office for the Protection of Competition- Czech Republic

- Denmark Finanstilsynet Warnings- Denmark
- Danish Financial Services Authority Warnings- Denmark
- EU Most Wanted- Europe
- European Commission Banned Airlines- Europe
- European Bank ineligible entities- Europe
- FIN-FSA Finanssivalvonta Finansinspektione- Finland
- Hellenic Capital Market Commission- Greece
- Guernsey Registry - Disqualified Directors and Involuntary Strike-Offs- Guernsey
- Gazdasági Versenyhivatal Decisions- Hungary
- Hungarian Competition Authority- Hungary
- Central Bank Warnings- Ireland
- Companies Registration Office- Ireland
- Ireland Revenue Defaulters List- Ireland
- Isle of Man Employment Decisions Tribunals- Isle of Man
- Isle of Man Courts Ordinary Procedure- Isle of Man
- FSC Disqualified Commission- Isle of Man
- Israel Antitrust Authority Enforcement Activity- Israel
- Banca D'Italia Disciplinary Measures- Italy
- National Bank of Kazakhstan- Kazakhstan
- Commission de Surveillance du Secteur Financier- Luxembourg
- Lithuanian list of the target areas
- Malta Financial Intelligence Unit Administrative Penalties- Malta
- Individual Voluntary Arrangement Register- Northern Ireland
- Pakistan National Accountability Bureau- Pakistan
- Polish Financial Supervision Authority- Poland
- Comissão Do Mercado De Valores Mobiliários- Portugal
- Romania Most Wanted List- România
- Saudi Arabia Washington Embassy- Saudi Arabia
- Finansinspektionen- Sweden
- Switzerland FINMA Unauthorized Services- Switzerland
- Tajikistan Ministry of Internal Affairs Wanted- Tajikistan
- Dubai Financial Services Authority Alerts- United Arab Emirates
- FCA Warnings- United Kingdom
- UK Crimestoppers Most Wanted- United Kingdom
- Financial Services Commission Public Statements- Jersey
- Court of Appeal Criminal Division- United Kingdom
- United Kingdom Serious Fraud Office- United Kingdom
- National Crime Agency Most Wanted- United Kingdom
- FCA Final Notices – enforcement- United Kingdom
- Disqualified Directors Register- United Kingdom
- FCA Unauthorized Firms and Individuals- United Kingdom
- Solicitors' Disciplinary Tribunal- United Kingdom
- The Gazette - Insolvency Notices- United Kingdom United States and Canada
- Alberta Securities Commission Decisions and Orders- Canada
- British Columbia Securities Commission Cease Trade Orders- Canada
- British Columbia Securities Commission Disciplined Persons List- Canada
- British Columbia Securities Commission Denied Persons List- Canada
- British Columbia Insurance Council Disciplinary Decisions- Canada
- Calgary Police Service- Canada

- Canada Border Services Agency Wanted- Canada
- Canadian Securities Administrators Disciplined Persons- Canada
- Canada Chartered Professional Accountant of Ontario- Canada
- Canada Competition Bureau- Canada
- Canada Investment Industry Regulatory Organisation- Canada
- Canada Law Society Tribunal- Canada
- Canada Mutual Fund Dealers Association Enforcement Hearings- Canada
- Public Notice Of Administrative Monetary Penalties- Canada
- Canada Public Notices Financial Transactions and Reports Analysis Center- Canada
- Royal Canadian Mounted Police Wanted List- Canada
- Canadian Securities Commission- Canada
- Canadian Securities Commission Investor Alerts- Canada
- Canada OSFI Warnings Notices- Canada
- Edmonton Police Service- Canada
- Manitoba Insurance Council Disciplinary Decisions- Canada
- Manitoba Securities Commission- Canada
- Montreal Exchange Disciplinary Decisions- Canada
- New Brunswick Financial and Consumer Services Tribunal- Canada
- Newfoundland and Labrador Cease Trade Orders- Canada
- Nova Scotia Securities Commission Enforcement Proceedings - Canada
- Ontario Financial Services Commission- Canada
- Ontario Financial Services Commission Enforcements Activities- Canada • Ontario Provincial Police- Canada
- Ontario Securities Commission- Canada
- Peel Regional Police- Canada
- Québec Chambre De La Sécurité Financière- Canada
- Québec Bureau de Décision et de Révision- Canada
- Québec Secretariat of the Council of the Treasury- Canada
- Saskatchewan Financial Services Commission Cease Trade Orders- Canada
- Saskatchewan Insurance Councils Disciplinary Decisions- Canada
- Toronto Most Wanted- Canada
- Alabama Baldwin and Etowah County Inmates- United States
- Alabama Calhoun County Inmates- United States
- Alabama Cherokee and Franklin County Inmates- United States
- Alabama Department of Corrections- United States
- Alabama Fayette County Inmates- United States
- Alabama Medicaid Suspended Providers- United States
- Arkansas Department of Health Excluded Providers List- United States
- Arkansas Real Estate Commission Warnings- United States
- Chicago Board Options Exchange Disciplinary- United States
- Connecticut Department of Social Services Administrative Actions List- United States
- District of Columbia Excluded Parties List- United States
- FBI Most Wanted- United States
- Federal Deposit Insurance Corporation Failed Bank List- United States
- FINCEN Money Laundering Concern List- United States
- Florida Agency for Healthcare Admin Medicaid Sanctioned Providers- United States
- Florida Department of Corrections- United States
- Foreign Agents Registrations- United States
- Georgia OIG Exclusions List- United States

- Guantanamo Bay Detainees- United States
- Hawaii Medicaid Excluded Providers- United States
- Inter-American Development Bank- United States • Kentucky Medicaid Termination and Exclusion List- United States
- Louisiana Department of Health Hospitals Exclusion List- United States
- Maine Medicaid Exclusion List- United States
- Maryland Department of Health Mental Hygiene Exclusions List
- Massachusetts Health and Human Services List of Suspended or Excluded Masshealth Providers
- Michigan Department of Community Health List of Sanctioned Providers- United States
- Minnesota Department of Human Services Excluded Provider Lists- United States
- Mississippi Gaming Commission Exclusion List- United States
- Missouri Department of Social Services Medicaid List of Terminated Providers- United States
- Montana Excluded or Terminated Medicaid Providers- United States
- Nevada Gaming Control Board Excluded- United States
- Nevada GCB Most Wanted- United States
- New Jersey Office of the State Comptroller Consolidated Debarment Report- United States
- New York Office of the Medicaid Inspector General List of Exclusions- United States
- NYSE Non Compliant Issuers- United States
- NYSE Regulation: Disciplinary Actions- United States
- Ohio Department of Corrections Wanted- United States
- SEC Trading Suspensions- United States
- US Air Force Fugitives- United States
- US Arizona Department of Insurance- United States
- US Army Most Wanted- United States
- US Bureau of Alcohol Tobacco Firearms and Explosives Commission Most Wanted - United States
- US Consumer Financial Protection Bureau- United States
- US DEA Fugitives- United States • US Department of Commerce Denied Persons- United States
- US Department of Housing and Urban Development Limited Denials of Participation - United States
- US Department of State Consent Agreements- United States
- US FDA Clinical Investigators Disqualification Proceedings- United States
- US FDA Debarment List- United States
- US FFIEC Failed Bank List- United States
- US Financial Industry Regulatory Authority- United States
- US Georgia Bureau of Investigation- United States
- US Immigration and Customs Wanted- United States
- US Indiana Most Wanted List- United States
- US Marshals Wanted- United States
- US Medicaid Exclusions Lists OIG LEIE- United States
- US OCC Enforcement Actions List Archive- United States
- US Office of the Comptroller of the Currency- United States
- US Pennsylvania General Services Department List- United States
- US Postal Inspection Service Most Wanted- United States
- US Redding Most Wanted- United States
- US Rewards for Justice- United States
- US Securities and Exchange Commission Unregistered Soliciting Entities- United States
- US State Department AECA Debarments- United States

- US System for Award Management Exclusions- United States
- US Nasdaq Trader PHLX Disciplinary Actions- United States Latin America and Caribbean
- Bahamas Central Bank- Bahamas
- Belize Warning Notices- Belize
- Bermuda Monetary Authority- Bermuda
- Brazil Civil Police Wanted- Brazil
- Brazil National Register of Punished Companies CNEP- Brazil
- Brazil National Registry Of Ineligible And Suspended Companies- Brazil
- Brazil Policia Federal Most Wanted List- Brazil
- Brazil Register of Non-Profit Entities CEPIM- Brazil
- Brazil Registration of Federal Administration Expulsions (CEAF)- Brazil
- Brazil Warnings Policia Civil Rio Grande do Sul Wanted- Brazil
- British Virgin Islands Financial Services Commission- British Virgin Islands
- Chile Unidad de Análisis Financiero- Chile
- Colombian Financial Superintendence- Colombia
- Costa Rica Superintendencia General De Seguros- Costa Rica
- México Comisión Nacional Bancaria y De Valores- Mexico International
- Debarred Entities- Asian Development Bank
- Sanctioned Entities- Inter-American Development Bank
- Wanted List- Interpol
- Debarred List- World Bank
- Investor Alerts- International Organization of Securities Commissions (IOSC)