Sanctions Screening & Compliance Disclosure

We are https://etrionis.com/ operated by WHITE STONES MANAGEMENT LTD, registered under the number HE 428792 in accordance with the legislation of Cyprus republic, with the address: Andrea Paraskeva, 44, Strovolos, 2024, Nicosia, Cyprus (Brand name – Etrionis).

We are committed to conducting its business in full compliance with applicable **international sanctions and anti-money laundering (AML) laws and regulations**. We maintain policies and procedures to ensure full compliance with EU Council Regulations, and related guidance issued by OFSI and FATF.

1. Compliance Framework

We perform ongoing screening of customers, counterparties, and transactions against relevant sanctions lists, including but not limited to those maintained by:

- **European Union (EU) Consolidated Sanctions List**
- **United Nations (UN) Sanctions Lists**
- **U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC)**
- Any other applicable national or international sanctions authorities where our services are offered.

Screening is conducted both **at onboarding** and **on an ongoing basis** throughout the customer relationship.

2. Transaction Screening

All transactions processed through our systems are subject to automated sanctions and risk-based screening.
We may **block, reject, or delay** any transaction or activity that appears to involve:

- A person or entity listed on a sanctions list;
- A country or jurisdiction subject to sanctions; or
- Funds or activities that may be linked to prohibited conduct.

Such actions are taken in accordance with applicable legal and regulatory obligations, and without prior notice where required by law.

3. Customer Obligations

By using our services, customers confirm that:

- They are **not subject to any sanctions** imposed by the United Nations, the European Union, the United Kingdom, the United States, or any other competent authority;
- They will not use our services to conduct or facilitate transactions that breach any applicable sanctions; and
- They will promptly notify us of any change in their sanctions status or ownership structure that could affect compliance.

4. Disclosure of Information

In compliance with applicable regulations, **Etrionis** may disclose information to competent authorities, regulators, or partner financial institutions when required for sanctions or AML purposes.

5. Restricted Jurisdictions

We do not provide services to persons or entities located in, or associated with, jurisdictions subject to comprehensive international sanctions or where our services would be contrary to applicable law or regulatory restrictions.

A list of restricted or high-risk jurisdictions may be updated from time to time based on guidance from the **FATF**, **OFSI**, and other competent bodies.

6. Legal Notice

This Sanctions Screening Disclosure is for informational purposes only. It does not create or modify any contractual or legal rights and may be updated periodically to reflect changes in legal or regulatory requirements.

7. Contacts

For questions regarding our sanctions compliance framework, please contact:

📧 Email: support@etrionis.com

📞 Phone: +447700182709

📍 Address: Andrea Paraskeva, 44, Strovolos, 2024, Nicosia, Cyprus.

Attachment 1
List of Prohibited jurisdictions

We cannot operate in certain countries and regions due to regulatory restrictions.

For onboarding – The prohibited jurisdictions pertain to the countries and regions where companies are incorporated, as well as the countries of incorporation of the UBOs and Directors;

For incoming payments – Prohibited jurisdictions apply to where funds originate and/or where a payer is geographically located.

For outgoing payments – Prohibited jurisdictions apply to where funds originate and/or where a payer is geographically located.

In accordance with our anti-money laundering policy and sanction screening requirements, we are unable to open accounts for companies, UBOs, and Directors from the countries and regions mentioned in this list.

If our client or their customers send funds from a bank account or are located in the prohibited jurisdictions, the funds transfer will be rejected.

The list of prohibited jurisdictions include:

- Afghanistan
- Belarus
- Burundi
- Central African Republic
- Congo
- Cuba
- Guinea
- Guinea-Bissau
- Haiti
- Iran
- Iraq
- Korea, the Democratic People's Republic of
- Lebanon
- Libya
- Mali
- Myanmar
- Nicaragua
- Palestine
- Russian Federation
- Somalia
- South Sudan
- Sudan
- Syrian Arab Republic
- Venezuela
- Western Sahara
- Yemen
- Zimbabwe

For incoming and outgoing payments, we (additionally to the above mentioned prohibited jurisdictions) do not allow transactions from/to

- Abkhazia (Georgia)
- Imereti (Georgia)
- Mtskheta-Mtianeti (Georgia)
- Rach'a-Lechkhumi-Kvemo Svaneti (Georgia)
- Shida Kartli (Georgia)
- Avtonomna Respublika Krym (Ukraine)

- Donetska oblast (Ukraine)
- Khersonska oblast (Ukraine)
- Luhanska oblast (Ukraine)
- Zaporizka oblast (Ukraine)
- Sevastopol (Ukraine)
- Transnistria (Moldova (the Republic of))