



## The 3rooks Money S.p.A.

### – Customer Acceptance Policy –

## 1. Introduction

This section defines The 3rooks Money S.p.A.'s approach to managing risk associated with customer onboarding, outlining the criteria for acceptance and risk level classification in compliance with applicable regulations and industry's best practices.

## 2. General Principles

The 3rooks Money S.p.A. is committed to balancing accessibility to its services with the need to protect itself from potential exposure to illicit activities, including money laundering and terrorist financing. The institution adopts a risk-based approach during the evaluation phase of potential customers, assessing their nature, activities, and origin to mitigate financial, reputational, and regulatory risks.

## 3. Accepted Customer Categories

The institution accepts applicants from the following categories, subject to prior assessment and provided they undergo appropriate verification and continuous monitoring:

- **Regulated individuals and legal entities:** Companies with financial licenses, payment institutions, electronic money institutions, and other entities subject to regulatory oversight.
- **Companies with solid corporate structures:** Businesses with transparent ownership and management, a clear control structure, and legitimate activities.
- **Professionals and businesses in low-risk sectors:** Companies operating in industries not considered sensitive from a regulatory or reputational standpoint.
- **Customers with a proven financial history:** Entities with established financial activities and no previous involvement in high-risk operations.

### 3.1 High Risk - Accepted Customer Categories

The institution applies enhanced due diligence measures to at least the following applicant categories:

- **Non-financial regulated sectors:** Companies operating in licensed or regulated fields, such as gaming, forex, and precious metals trading.
- **Customers with complex corporate structures:** Companies with intricate ownership chains requiring greater transparency in verifying the Ultimate Beneficial Owner (UBO).
- **Entities operating in high-risk jurisdictions:** Applicants based in or conducting significant transactions with countries flagged for enhanced monitoring by international authorities such as FATF and Moneyval.
- **Politically Exposed Persons (PEPs):** Applicants classified as PEPs, their family members, or close associates.



## 4. Non-Accepted Customer Categories

The 3rooks Money S.p.A. does not accept applicants falling into the following categories due to the excessive risk posed to the institution:

- **Individuals or entities subject to international sanctions:** Those listed in restriction lists issued by organizations such as the European Union, the United Nations, and OFAC.
- **Businesses in highly risky sectors:** Clients engaged in industries with high exposure to money laundering risks, such as shell banks or shell companies, unregulated casinos, unregulated or unregistered associations and foundations, arms trade, narcotics, adult entertainment, counterfeit goods sales, and unregulated payment services.
- **Customers with opaque corporate structures:** Entities that do not provide clear information about beneficial ownership and the nature of their operations, including those with nominee shareholders or non-transparent trusts.
- **Customers based in blacklisted countries:** The 3rooks Money S.p.A. does not onboard clients from jurisdictions included in international blacklists (e.g., FATF, EU), which identify countries with severe deficiencies in anti-money laundering and counter-terrorist financing measures.
- **Companies dealing in cryptocurrencies or digital assets without proper regulation:** Clients engaged in cryptocurrency exchange, custody, or transactions operating without adequate licensing or regulatory oversight.
- **Clients operating in fraud-prone sectors:** Activities related to pyramid schemes, unregulated multi-level marketing (MLM), or other business models known for financial fraud risks.
- **Clients with an incompatible business model:** Companies whose primary activity is inconsistent with The 3rooks Money S.p.A.'s strategies or present an unmanageable level of operational risk.
- **Applicants posing a reputational risk:** The 3rooks Money S.p.A. rejects onboarding companies or individuals with a high reputational risk, continuously monitoring adverse media as a potential reason for rejection or termination of relationships.

## 5. Monitoring and Review

All clients are subject to continuous monitoring to promptly detect any changes in their activities or risk position. The 3rooks Money S.p.A. reserves the right to periodically review acceptance criteria and update risk mitigation measures based on regulatory and operational developments.

## 6. Conclusion

The 3rooks Money S.p.A.'s onboarding policy is an integral part of the company's overall risk management framework. Every acceptance or rejection decision is guided by the objective of ensuring regulatory compliance and business sustainability while maintaining a balance between commercial opportunities and risk management.