



1. Introduction

The Anti-Fraud Policy (the “AF Policy”) of ITI CORPORATION UAB of : Vilnius, Lithuania, registration number : 306146260 (“we”, “our”, “us” or “ITI CORPORATION UAB”) is established to prevent and mitigate possible risks of ITI CORPORATION UAB being involved in illegal or illicit activities and to enable ITI CORPORATION UAB to meet its legal and regulatory obligations in this area (if any, where applicable). This AF Policy is subject to changes and updates by ITI CORPORATION UAB from time to time to ensure compliance with any applicable legislation and global AF practices.

2. Policy Statement

2.1. ITI CORPORATION UAB will comply with applicable laws of Republic of Lithuania. In line with applicable laws ITI CORPORATION UAB has a ‘zero tolerance’ policy towards fraud, collusion, money laundering, financing of terrorism and other criminal conduct and will thoroughly investigate and seek to take legal action against those who perpetrate, are involved in, or assist with fraudulent or other improper actions in all ITI CORPORATION UAB activity and related transactions.

2.2. ITI CORPORATION UAB will provide adequate and appropriate resources to implement the Anti-Fraud Policy and will ensure it is communicated and understood.

3. Purpose & Scope

3.1. The purpose of this document is to outline the responsibilities of all the involved parties with respect to fraud prevention, the actions to be taken if fraud is suspected and the mechanism of verifying suspicion of fraud, the reporting process and the recovery action plan.

4. Legislation Compliance

4.1. The Anti-Fraud Policy has been drafted to comply with the current applicable law, including, but not limited to applicable laws of Republic of Lithuania.

4.2. Adherence to the Anti-Fraud Policy ITI CORPORATION UAB will ensure compliance with all relevant legislation and internal policies.

5. The User verification

5.1. The User undertakes to provide ITI CORPORATION UAB with correct and relevant personal information and documents contained therein. In case the User provides counterfeit documents and false personal information, such behavior will be interpreted as a fraudulent activity.

5.2. The User hereby authorizes ITI CORPORATION UAB, directly or indirectly (through third parties), make any inquiries as we consider it necessary to check the relevance and accuracy of the information provided for verification purposes. Personal Data transferred will be limited



to strictly the necessary and with security measures in use to protect the data and is specifies in our Privacy Policy.

6. Key Responsibilities

6.1. In view of the Anti-Fraud Policy ITI CORPORATION UAB is responsible for:

- Undertaking a regular review of the fraud risks associated with each of the key organizational objectives;
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified;
- The design of an effective control environment to prevent fraud; • Establishing appropriate mechanisms for: o reporting fraud risk issues.
- Making sure that all staff are aware of ITI CORPORATION UAB Anti-Fraud Policy and know what their responsibilities are in relation to combating fraud; and
- Ensuring that appropriate action is taken to minimize the risk of previous frauds occurring in future.

6.2. The Company has to identify you as a cardholder, an individual who is issued and authorized to use a card, in order to be compliant with applicable anti-fraud requirements. In order to prevent fraud and the misuse of funds, the Company needs to ensure that the card used for payment belongs to the ITI CORPORATION UAB account holder. In the situation where the Company's staff has a reason to make any additional checks, the staff member may request additional supporting materials from the account holder including without limitation bank account details of cardholder in order to make a refund where applicable.

7. Fraud detection and investigation

7.1. ITI CORPORATION UAB Operational Anti-Fraud Department, in particular, the Head of Anti-Fraud Services, is the first line of detection, investigation and protection in preventing Prohibited Activities through the Users and transactions appraisal process. The Head of Anti-Fraud Services will be responsible for the proper fulfillment of the Anti-Fraud Policy.

8. Miscellaneous

8.1. ITI CORPORATION UAB will review the Anti-Fraud Policy to reflect new legal and regulatory developments and ensure good practice

Last updated: 11/10/2022