xpate

xpate SIA Prohibited Activities

Version	2
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You may not use the Services to enable you or any other person to benefit from any illegal activities or activities that we decide are prohibited business or activity from time to time (collectively, "**Prohibited Activities**"). Prohibited Activities include:

1. The use of the Services in or for the benefit of a country, organisation, entity, or person embargoed or blocked by any government, including those in sanctions list such as:
    - The United Nations Security Council Sanctions List (UN);
    - The Consolidated List of European Union Financial Sanctions (EU);
    - Sanctions lists administered by the United States Office of Foreign Assets Control (OFAC), including the List of Specially Designated Nationals and Blocked Persons;
    - HM Treasury Sanctions List;
    - Latvian Sanctions List.
2. Adult services connected to human trafficking;
3. Escort services;
4. Counterfeit goods and violation of intellectual property, items that violate someone's privacy;
5. Antiques or art dealers;
6. Activities aimed at circumventing security controls (software, hardware);
7. Unregulated pharmaceuticals / food supplements (e.g.“nutraceuticals”) - drugs, narcotics, steroids, other products with danger to health, homemade alcoholic beverages, cigarettes and tobacco;
8. Unlicensed virtual asset service providers unless special exception (No digital ledger / trading, only payment gateway);
9. Get rich quick scheme (Short term investment for very high return);
10. Shell banks and/or businesses dealing with shell banks, offshore bank transactions (Offshore refers to the EU commission tax evasion blacklist and grey list. Any exceptions need to be approved by the MLRO);
11. Binary options;
12. Dealers in precious metals and stones;
13. Pyramid marketing or any service where the primary payments are commission to people for joining rather than payments for the product or services properly structured Multi-Level or Network Marketing is not necessarily prohibited;
14. Transactions with living animals (exceptions possible like payments for horse riding, dog classes or similar services);
15. Fourth party payment & multi-layered MSB arrangements;
16. Unlicensed / unregulated financial institutions (where licencing required)
17. Political / religious organisations engaged in hate speech (Selling, hosting, distributing, producing or promoting offensive materials, including materials that incites racial hatred or promotes discrimination based on gender, race, religion, national origin, physical ability, sexual orientation, or age);
18. Hawala;
19. Online pharmacies;

20. All industries and activities involving production or distribution of weapons, ammunition and other military products, dual use goods, human organs;
21. Remittances funded in cash;
22. Unregistered / unlicensed charities and associations;
23. Piracy or illegal streaming;
24. Unregulated securities trading.

If you are uncertain whether a category of business or activity is a Prohibited Activity or have questions about how these restrictions apply to you, please contact us.