

Safety above all.

AML safeguards at Pluxee Poland



Dear Sir or Madam,

Having operated in the market for 27 years, first as Sodexo BRS and for more than a year under the Pluxee brand, we have always focused on the safety and satisfaction of our clients. We are constantly improving our products to guarantee their **safety, compliance with current legislation and procedures related to anti-money laundering and counter-terrorist financing**, aiming to protect both our company and our clients from potential threats. Thanks to this, we can guarantee that the solutions we offer are not only innovative, but also secure and fully compliant with legal standards, which translates into trust and loyalty of our clients.

What is the purpose of the anti-money laundering and counter-terrorist financing legislation?

Anti-Money Laundering and Countering the Financing of Terrorism regulations are designed to **protect the financial system and the economy from fraud and criminal activity**. Applying these procedures first and foremost **enhances the security of our clients so that they can be assured that their funds are protected and that we are taking appropriate steps to prevent fraud**. As part of our **anti-money laundering (AML) and know-your-client (KYC)** procedures, we are required to carry out identity verification on our clients. As an e-money distributor and responsible business partner, we are committed to the highest standards of security and compliance with regulations with the goal of keeping our clients' funds safe.

What will you be asked to do?

Ensuring that our products meet all legal requirements, a dedicated Key Account Manager will ask you to **complete an identification questionnaire KYC (Know Your Client) and will verify your identity by showing an ID card**. Identity verification by means of an ID card is an essential means of ensuring compliance with Directive (EU) 2015/849, also known as AML Directive IV. It requires financial institutions and other regulated entities to conduct thorough KYC procedures, including verification of the identity of individuals and legal entities.

What is the AML procedure and what are its key elements?

To ensure your convenience and enjoyment, we have introduced a simple and quick **business client identification (KYC) process** as part of our distribution agreement. Our goal is to minimize paperwork and maximize the benefits of using our products.

Pluxee responsibility

- **Getting to know the customer** - we will analyze the information you provide in the questionnaire to make sure it is consistent with the data we already have. This allows us to fully understand your company's business.
- **Checking sanction lists** - we will perform a verification to ensure that your company and the people associated with it are not on any sanction lists. This is a pure formality to secure our cooperation.
- **Risk assessment** - based on the information collected, we will perform an internal risk assessment. This is a process that is designed to protect both you and us.
- **Special case management** - if necessary, we will approach cases where there are policy-affiliated persons (PEPs) in your company with due care to avoid any difficulties.

Client Responsibility

- **Filling out the questionnaire** - you will receive a questionnaire from us, we will ask you to complete the required information. This is a minimum of paperwork that allows us to go through the entire process quickly and efficiently.
- **Reaping the benefits** - with a simplified process, you can focus on maximizing the benefits of our products and services, without unnecessary paperwork.

With this approach, we minimize the paperwork and maximize the benefits of cooperation. We are here to support you every step of the way and ensure that the entire process is quick, easy and hassle-free.

How do Pluxee and Imagor ensure safety and compliance?

Pluxee is 100% owned by Imagor S.A., which is responsible for issuing prepaid cards and processing e-money transactions, and is authorized and regulated by the National Bank of Belgium. Imagor S.A., by complying with a number of guidelines and regulations, including anti-money laundering and counter-terrorist financing and electronic money and payment services regulations, **guarantees clients the highest security and full compliance with AML regulations**, both in Poland and throughout the European Union. Pluxee Poland has been notified by Imagor S.A. as **an electronic money distributor** in Poland. This means that, as an Electronic Money Institution, Imagor S.A. specifies detailed requirements for how Pluxee Poland distributes electronic money (in the form of prepaid cards) within Poland. These requirements include, among other things, obligations to verify customers in accordance with the AML/CFT Directive.

What is electronic money?

Electronic money, E-money is a modern form of currency that is **stored and processed electronically**. It is characterized by the absence of a physical carrier (banknote, coin), being **the digital equivalent of traditional forms of payment**. Pluxee and Imagor S.A. have entered into a distribution agreement, on the basis of which **Pluxee is a distributor of cards issued under the Imagor license, which in Poland has the status of an EU electronic money institution**. The distribution agreement imposes a number of legal obligations on Pluxee arising from the

need to comply with EU and Polish regulations on issuing as well as and distribution of electronic money and anti-money laundering.

How do we use your data?

Data provided to Pluxee Poland in connection with the establishment of a business relationship will be used **only within the framework of obligations under AML regulations:**

- Directive (EU) 2015/849 (AML Directive IV): [link to document](#)
- Anti-Money Laundering and Countering the Financing of Terrorism Law: [link to the law](#) including identification, verification and monitoring of customers.

Pluxee processes personal data to the extent necessary to fulfill its obligations under the Distribution Agreement and Imagor's AML Policy.

What benefits does the AML procedure guarantee you?

Pluxee's application of Imagor's AML Policy and other Imagor procedures for continuous monitoring of money laundering and terrorist financing risks provides you with a number of **financial security** benefits. Thanks to the standardization of Pluxee's procedures, our clients are assured that their **funds and transactions are protected** from being used for illegal purposes, minimizing the risks associated with fraud and money laundering. Through the use of advanced verification procedures, Pluxee protects its clients and safeguards their funds. Compliance with applicable regulations ensures that **Pluxee's products and services are fully compliant with Polish and international laws**. Clients can rest assured that when working with Pluxee, they are acting **in accordance with applicable legal standards**. Thanks to the transparency and responsibility that characterize Pluxee's operations, clients can use the offered products and services with full confidence, which promotes long-term cooperation.



Sincerely,

A handwritten signature in black ink, appearing to read 'Arkadiusz Rochala'.

Arkadiusz Rochala
General Director of Pluxee Poland