

# Sanctions Compliance Statement

As a global regulated financial institution, **Revolut Ltd. (“Revolut”) and all its subsidiaries and affiliated companies must comply with the sanctions laws and regulations of the United Nations, the European Union, the United Kingdom, the United States, and all other applicable sanctions laws and regulations in all jurisdictions in which Revolut operates.**

To this end, Revolut’s Global Sanctions Policy, identified the following as the minimum standards, with which Revolut and all its subsidiaries and affiliated entities must comply:

- **Screening all customers and applicable transactions globally** against sanctions lists issued by among others, the United Nations, the European Union, the United Kingdom, and the United States.
- **Screening against other local sanctions lists** that apply to Revolut’s operations in a particular jurisdiction.
- **Prohibiting business activity, including commencing or continuing customer relationships or providing products or services or facilitating transactions that Revolut deems to be in violation of applicable sanctions laws or its internal Global Sanctions Policy.** This includes prohibitions on business activity with individuals or entities named on a sanctions list or activity, directly or indirectly, involving countries or territories subject to comprehensive sanctions programmes. Currently, these countries and territories are Cuba, Iran, North Korea and Syria, as well as Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhia regions.
- **Restricting Transactions related to certain business activity involving, directly or indirectly, countries or persons subject to selective or targeted sanctions programmes.** These selective country programmes prohibit transactions and services relating to specific types of products or services and target certain industry sectors or governments, including:
  1. the provision of funding to/from the governments of Belarus, Libya, Sudan or Zimbabwe;
  2. certain activity involving the Government of Venezuela (*the term “Government of Venezuela” includes The state and Government of Venezuela, any political subdivision, agency, or instrumentality thereof, including the Central Bank of Venezuela and Petroleos de Venezuela, S.A. (“PdVSA”), any person owned or controlled, directly or indirectly, by the foregoing, and any person who has acted or purported to act directly or indirectly for or on behalf of, any of the foregoing, including as a member of the Maduro regime*);
  3. certain transactions and services involving the Russian financial, energy and defence sectors;
- **Investigating all customer/client alerts or transactions that are stopped in Revolut’s screening systems.** While Revolut seeks to investigate these alerts and transactions in a reasonable timeframe, compliance with applicable sanctions laws or its internal Global Sanctions Policy may result in delays to the processing of customer transactions while additional due diligence is conducted and information obtained on the nature of the underlying transaction or the parties involved.
- **Blocking or rejecting transactions where Revolut is required to do so under applicable sanctions laws and regulations or its own internal Global Sanctions Policy.** Transactions may

also be returned by Revolut where there are no freezing or reporting obligations but transactions are deemed to be outside of Revolut's risk appetite.

- **Reporting breaches of sanctions laws to the relevant regulatory authorities.** This can include any attempt by a customer to evade sanctions laws.