

Prohibited and Restricted Countries and Territories

Jurisdictional Risk Policy

Escrowfy GmbH

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1. Introduction

1.1. Escrowfy GmbH, operating under the Oxen Finance brand (“Oxen”, “we”, “our”), is committed to complying with all applicable international sanctions regimes, anti-money laundering laws, and counter-terrorism financing regulations. As part of this commitment, we maintain a risk-based approach to jurisdictional exposure that determines the countries and territories from which we will accept clients, process transactions, or provide services.

1.2. This policy sets out the countries and territories that are prohibited (no services of any kind) or restricted (services subject to enhanced due diligence and prior approval) in connection with the use of the Oxen Finance platform.

1.3. This policy is informed by, and must be read in conjunction with, the following sanctions regimes and regulatory frameworks:

- Swiss State Secretariat for Economic Affairs (SECO) sanctions ordinances;
- European Union restrictive measures (EU Sanctions Consolidated List);
- United Kingdom Office of Financial Sanctions Implementation (OFSI) sanctions;
- United States Office of Foreign Assets Control (OFAC) sanctions programs;
- United Nations Security Council (UNSC) sanctions resolutions;
- Financial Action Task Force (FATF) High-Risk Jurisdictions and Jurisdictions under Increased Monitoring;
- Abu Dhabi Global Market (ADGM) and UAE Central Bank sanctions requirements.

1.4. This list is reviewed and updated on a quarterly basis, or immediately upon changes to any of the sanctions regimes or FATF publications referenced herein. The most current version of this policy is always available at oxen.finance/prohibited-countries.

2. Classification Framework

We classify jurisdictions into three risk tiers:

Classification	Definition	Impact on Services
PROHIBITED	Jurisdictions subject to comprehensive international sanctions, FATF Call for Action (blacklist), or presenting unacceptable risk	No services. No accounts. No transactions. Complete prohibition.
RESTRICTED	Jurisdictions on the FATF grey list, subject to targeted/sectoral sanctions, or presenting elevated AML/CTF risk. Services may be available subject to enhanced due diligence and senior management approval.	Enhanced Due Diligence (EDD) required. Senior management approval mandatory. Ongoing enhanced monitoring.

3. Prohibited Countries and Territories

Oxen Finance does not provide any services to, does not accept any clients from, and does not process any transactions involving the following countries and territories. This prohibition applies to natural persons who are nationals or residents of, and legal entities that are incorporated, domiciled, or operating in, the jurisdictions listed below.

3.1 Comprehensively Sanctioned Jurisdictions

The following jurisdictions are subject to comprehensive sanctions by one or more of SECO, EU, OFAC, OFSI, and/or UNSC:

Country/ Territory	Sanctions Basis and Rationale
Afghanistan	UNSC, EU, OFAC, SECO – Taliban regime; terrorism financing; proliferation risk
Belarus	EU, UK, SECO, OFAC – Support of Russia's aggression against Ukraine; human rights violations
Central African Republic	UNSC, EU, SECO – Armed conflict; arms embargo; targeted sanctions
Cuba	OFAC comprehensive; EU targeted – Long-standing US embargo; limited financial infrastructure
Crimea (Ukraine)	EU, OFAC, UK, SECO – Illegally annexed territory; comprehensive territorial sanctions
Democratic People's Republic of Korea (North Korea)	UNSC, EU, OFAC, UK, SECO – FATF blacklist; WMD proliferation; comprehensive sanctions; countermeasures required

Donetsk / Luhansk / Zaporizhzhia / Kherson regions (Ukraine)	EU, OFAC, UK, SECO – Non-government-controlled areas; territorial sanctions
Eritrea	UNSC (partially lifted), EU targeted – Regional destabilisation; human rights
Iran	UNSC, EU, OFAC, UK, SECO – FATF blacklist; nuclear proliferation; terrorism financing; countermeasures required
Iraq	UNSC targeted, EU, OFAC – Terrorism financing; sectoral restrictions; proliferation concern
Libya	UNSC, EU, SECO – Armed conflict; arms embargo; asset freeze; illicit financial flows
Mali	UNSC, EU, SECO – Political instability; armed conflict; terrorism financing
Myanmar (Burma)	UNSC, EU, OFAC, UK, SECO – FATF blacklist; military coup; human rights violations; EDD/countermeasures
Nicaragua	OFAC targeted, EU – Human rights violations; democratic erosion; targeted sanctions
Russia	EU, UK, SECO, OFAC – Comprehensive financial, sectoral, and trade sanctions following invasion of Ukraine
Somalia	UNSC, EU, SECO – Armed conflict; terrorism (Al-Shabaab); arms embargo
South Sudan	UNSC, EU, SECO, OFAC – Armed conflict; FATF grey list; human rights violations; arms embargo
Sudan	UNSC, EU, OFAC, SECO – Armed conflict; human rights; terrorism financing history
Syria	UNSC, EU, OFAC, UK, SECO – FATF grey list; comprehensive sanctions; armed conflict; WMD
Venezuela	OFAC comprehensive, EU targeted – FATF grey list; democratic crisis; corruption; financial crime risk
Yemen	UNSC, EU, SECO – FATF grey list; armed conflict; humanitarian crisis; terrorism financing
Zimbabwe	EU (partially), OFAC, UK – Human rights; governance concerns; targeted sanctions

3.2 Additional Prohibited Jurisdictions

The following jurisdictions are prohibited due to active armed conflict, UNSC targeted sanctions, and/or the absence of any viable financial infrastructure for conducting meaningful due diligence:

Country/ Territory	Rationale
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Democratic Republic of the Congo	FATF grey list; UNSC targeted sanctions; armed conflict; inadequate financial infrastructure
Guinea-Bissau	UNSC targeted; political instability; inadequate AML/CTF infrastructure

Important: This list is not exhaustive. We reserve the right to decline or terminate a business relationship with any person or entity in any jurisdiction where we determine, at our sole discretion, that the provision of services would be unlawful, would expose us to unacceptable risk, or would be inconsistent with our regulatory obligations.

4. Restricted Countries and Territories

Services may be available to clients from the following jurisdictions, subject to the successful completion of Enhanced Due Diligence (EDD), senior management approval, and ongoing enhanced monitoring. Onboarding of clients from restricted jurisdictions requires prior written approval from the Chief Compliance Officer.

4.1 FATF Jurisdictions under Increased Monitoring (Grey List)

As of 13 February 2026, the following jurisdictions are on the FATF grey list. Where a jurisdiction is also subject to domestic cryptocurrency restrictions, services are limited to fiat payment facilitation only (see Section 5.1 for details).

Country/ Territory	Rationale and Risk Factors
Algeria	FATF grey list; domestic restrictions on cryptocurrency; fiat payment services only (see Section 5.1)
Angola	FATF grey list; AML/CTF deficiencies under remediation
Bolivia	FATF grey list; cryptocurrency prohibited by domestic law; fiat payment services only (see Section 5.1)
Bulgaria	FATF grey list; EU Member State with identified AML weaknesses
Cameroon	FATF grey list; terrorism financing risk (Boko Haram nexus)
Côte d'Ivoire	FATF grey list; AML/CTF strategic deficiencies
Haiti	FATF grey list; political instability; limited financial infrastructure; deferred FATF reporting
Kenya	FATF grey list; terrorism financing risk; AML framework gaps
Kuwait	FATF grey list (added February 2026); AML/CTF effectiveness shortcomings
Lao PDR	FATF grey list; limited financial oversight; narcotics-related laundering risk

Lebanon	FATF grey list; banking sector crisis; Hezbollah-related financial crime risk
Monaco	FATF grey list; beneficial ownership transparency concerns
Namibia	FATF grey list; AML/CTF strategic deficiencies
Nepal	FATF grey list; cryptocurrency banned by Nepal Rastra Bank; fiat payment services only (see Section 5.1)
Papua New Guinea	FATF grey list (added February 2026); AML/CTF infrastructure gaps
Vietnam	FATF grey list; AML/CTF effectiveness gaps
British Virgin Islands (UK)	FATF grey list; beneficial ownership and transparency concerns

4.2 Other Restricted Jurisdictions

The following jurisdictions are classified as restricted due to elevated risk factors, including but not limited to partial sanctions, sectoral restrictions, inadequate AML/CTF frameworks, opacity of beneficial ownership, or elevated corruption indices:

Country / Territory	Rationale and Risk Factors
Bangladesh	Domestic restrictions on cryptocurrency (Bangladesh Bank); fiat payment services only (see Section 5.1); EDD mandatory
China (PRC)	Domestic restrictions on cryptocurrency transactions (PBOC/CBIRC 2021 Notice); capital controls; services limited to fiat payment facilitation and non-crypto financial services only; crypto-related services prohibited for PRC-resident clients; EDD with source of funds verification mandatory
Egypt	Central bank restrictions on cryptocurrency; fiat payment services only (see Section 5.1); limited regulatory framework
Morocco	Cryptocurrency prohibited by Bank Al-Maghrib; foreign exchange controls; fiat payment services only (see Section 5.1)
Pakistan	Cryptocurrency regulations unclear; elevated terrorism financing risk; fiat payment services only (see Section 5.1); enhanced monitoring required
Tunisia	Cryptocurrency activities restricted by domestic regulation; fiat payment services only (see Section 5.1)
Bahrain	Regional risk; targeted sanctions exposure; proximity to sanctioned jurisdictions
Bosnia and Herzegovina	EU candidate; sectoral sanctions history; elevated corruption risk
Cambodia	High money laundering risk; casino and real estate sector exposure; human trafficking
Colombia	OFAC narcotics-related targeted sanctions; elevated ML/TF risk

Curaçao	Elevated financial crime risk; licensing concerns; proximity to Venezuela
Honduras	Elevated narcotics and corruption risk; limited AML enforcement
Nigeria	Removed from FATF grey list (Oct 2025); residual AML risk; fraud typologies
Panama	Opacity of corporate structures; historical association with ML; FATF monitoring history
Paraguay	Tri-border area risk; contraband and narcotics nexus; limited AML enforcement
Philippines	Casino sector ML exposure; online gambling risk; FATF monitoring history
Serbia	EU candidate; elevated corruption risk; proximity to sanctioned jurisdictions
South Africa	Removed from FATF grey list (Oct 2025); residual AML risk; State Capture legacy
Trinidad and Tobago	Elevated narcotics and corruption risk; FATF monitoring history
Vanuatu	Historical tax haven; limited AML infrastructure; FATF monitoring history

5. Enhanced Due Diligence Requirements for Restricted Jurisdictions

For clients from restricted jurisdictions, the following enhanced measures must be applied in addition to our standard KYC/KYB procedures:

- Prior written approval from the Chief Compliance Officer (CCO) before onboarding;
- Enhanced source of funds and source of wealth verification, including documentary evidence;
- Identification of the purpose and intended nature of the business relationship, with supporting documentation;
- Enhanced screening against all applicable sanctions lists (SECO, EU, OFAC, OFSI, UNSC), PEP databases, and adverse media;
- Increased frequency of periodic reviews (minimum every 6 months, rather than the standard review cycle);
- Enhanced transaction monitoring with lower thresholds and additional alert triggers;
- Documentation of the risk assessment and rationale for accepting the client, retained in the client file;
- Notification to the compliance team of any material changes in the client's circumstances, activity patterns, or risk profile.

5.1 Jurisdiction-Specific Service Limitations

The following restricted jurisdictions impose domestic legal restrictions on cryptocurrency activities. Clients from these jurisdictions are eligible for fiat-based services only. All cryptocurrency-related services are

unavailable, regardless of where the transaction originates or terminates.

Jurisdiction	Available Services	Prohibited Services
Algeria	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
Bangladesh	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
Bolivia	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
China (PRC)	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
Egypt	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
Morocco	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
Nepal	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
Pakistan	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)
Tunisia	Fiat payment facilitation; SEPA/SWIFT transfers; card services; escrow services; treasury and cash management	All cryptocurrency-related services (exchange, custody, transfer, OTC, wallets, stablecoin conversion, crypto settlement)

These service limitations reflect applicable domestic laws and regulations in the relevant jurisdictions. Clients from these jurisdictions will be informed of the applicable service limitations during onboarding and must acknowledge them in writing before account activation.

6. Transaction Restrictions

6.1. In addition to client-level restrictions, Oxen Finance does not process any transactions (incoming or outgoing) where the counterparty, beneficiary, originator, or any intermediary is located in a prohibited jurisdiction, regardless of the client's own jurisdiction.

6.2. Transactions involving restricted jurisdictions are subject to enhanced scrutiny, including manual review by the compliance team before processing.

6.3. Where a transaction involves a cryptocurrency wallet address associated with, or having exposure to, a prohibited jurisdiction (as identified through blockchain analytics tools), the transaction will be blocked and the client's account may be suspended pending investigation.

7. Consequences of Misrepresentation

7.1. Any client who provides false, misleading, or incomplete information regarding their nationality, country of residence, domicile, or place of incorporation in order to circumvent this policy may be subject to:

- Immediate suspension and/or termination of all accounts and services;
- Freezing of all funds and assets held on the Platform;
- Reporting to relevant regulatory authorities, financial intelligence units (including MROS), and law enforcement agencies;
- Legal action to recover any losses, costs, or damages incurred by Escrowfy GmbH.

7.2. Use of VPNs, proxy services, or other technical means to mask your true location in order to access services in contravention of this policy constitutes a material breach of our Terms of Use and General Terms and Conditions.

8. Updates and Review

8.1. This policy is reviewed on a quarterly basis and updated promptly following:

- Publication of new or amended SECO, EU, UK, US, or UNSC sanctions;
- FATF Plenary updates to the blacklist or grey list (published in February, June, and October each year);
- Changes in domestic legislation or regulatory guidance in jurisdictions relevant to our operations;
- Material changes to our risk appetite, banking partner requirements, or business strategy.

8.2. The most current version of this policy is always available at oxen.finance/prohibited-countries. Clients are responsible for reviewing this policy periodically. Material changes will be notified to existing clients.

9. Contact

If you have questions about whether your jurisdiction is eligible for Oxen Finance services, or if you believe your jurisdiction has been classified incorrectly, please contact:

General Enquiries

support@oxen.finance

Postal Address

Escrowfy GmbH, Bahnhofstrasse 7, 6300 Zug, Switzerland