

Pliant - Acceptable Use Policy

Document History

Version	Author (title)	Approver (title)	Change	Effective date
2.0	MLRO Compliance Officer	CEO - Pliant OY	Second version	20/06/2024
1.0	MLRO Compliance Officer	CEO - Pliant OY	Initial version	18/04/2023

Pliant's Acceptable Use Policy ("the Policy") sets out the principles for how to use Pliant's products and services. The purpose of this Policy is to communicate which customer types and activities Pliant's products and services address. Please note that the list is not exhaustive and can be subject to amendments. The Policy is applicable to current customers and for all who consider becoming a customer. The Policy covers the following aspects:

1. Not supported customers
2. Customer types requiring additional information for onboarding
3. Not supported activity
4. Activity requiring pre-approval
5. Restricted transactions
6. Violation of the Policy
7. Contact information

1. Not supported customers

Pliant cannot support the following customer types:

- 1.1 Entities violating any law, statute, ordinance or regulation.
- 1.2 Entities whose customer due diligence data cannot be gathered according to lawful requirements.
- 1.3 Entities who have established connections to the high risk jurisdictions listed by the European Union or Financial Action Task Force.
- 1.4 Entities that might potentially result in material reputational damage for Pliant.
- 1.5 Entities subject to international sanctions or embargoes, or whose legal representatives, ultimate beneficial owners or card holders are under restrictive measures.
- 1.6 Entities whose business activity is any of the following:
 - 1.6.1 Gambling or betting
 - 1.6.2 Adult entertainment: Dating, escort, pornography and any kind of physical and online sexual services
 - 1.6.3 Weapons
 - 1.6.4 Selling or producing cannabidiol (CBD)
 - 1.6.5 Financial services whose main business activity is to provide any of the following products:
 - 1.7.5.1 Contract for differences (CFD)
 - 1.7.5.2 Crowdfunding
 - 1.7.5.3 Virtual Currency
 - 1.7.5.4 Blockchain services
 - 1.7.5.5 Unlicensed Foreign exchange (FX)
 - 1.7.5.6 Unlicensed Money remittance
 - 1.7.5.7 Trust services
 - 1.7.4.8 Pawn broker
 - 1.6.6 Mining or extraction
 - 1.6.6.1 Coal or metal ores
 - 1.6.6.2 Gemstones or precious metals
 - 1.6.6.3 Oil or gas

- 1.6.7 Security services
- 1.6.8 Defence services
- 1.6.8. Retail, online, wholesale
 - 1.6.8.1 Precious stones or metal
- 1.6.9 Bar or nightclubs
- 1.6.10 Child adoption

2. Customer types requiring additional information for onboarding

At onboarding all customers are requested to provide initial due diligence information about the company, the activity, the Legal Representatives and the UBOs. Some customers will go through Enhanced Due Diligence (EDD) either due to their business activity (industry) or due to other risk triggers, such as links to high-risk jurisdictions.

3. Not supported activity

3.1 Due to international sanctions, Pliant cards cannot be used in the following countries:

- 3.1.1 Democratic People's Republic of Korea
- 3.1.2 Russia
- 3.1.3 Iran
- 3.1.4 Myanmar

3.2 Other not supported use cases

3.2.1 Pliant cards cannot be used for private purchases, solely for the customer company's own expenses.

3.2.2 Pliant does not support money top-ups to the cards account if the top-ups cannot be identified to originate from the customer's own business account. Top-ups originating from the sole-trader's private account need to be identified to belong to the customer. In both cases where identification cannot be done funds are returned to the sender account without further notification.

3.2.3 Sensitive card information is strongly advised not to be shared by the authorised cardholder with anyone and any entity, including merchants.

4. Activity requiring pre-approval

Pliant offers, as an additional feature, the possibility to enable ATM cash withdrawals, upon a customer's request, for Premium or Enterprise Plans. Pliant assesses the enablement of the feature on a case-by-case basis and has the right in its sole discretion to deny the enabling of the cash withdrawal feature.

5. Restricted transactions

5.1 Additional authentication may be required after a card transaction in some higher risk countries and jurisdictions outside of the European Economic Area. In these cases authentication can be done within the Pliant app.

5.2 Pliant cards cannot be used by merchants classified under merchant category codes in industries that predominantly generate the highest levels of cardholder disputes, representing higher levels of financial risk and/or creating additional brand risk for regulatory reasons.

6. Violations of the Policy

The Customer is independently responsible for adherence to the Policy and Pliant reserves the right in its sole discretion to make changes to it at any time. If Pliant has reasonable grounds to suspect a customer is using Pliant products or services for illegal activities, violating any terms and conditions or this Policy, Pliant reserves the right to suspend or terminate access to its services without giving prior notice. Pliant requests you to inform on violations of the Policy without delay. As a customer you agree to adhering to:

6.1 Being independently responsible for acting in accordance with all applicable laws and regulations in the use of Pliant's services

6.2 Comply with the T&Cs, the Policy and the Privacy Policy of Pliant

6.3 Notify Pliant if there are any changes in the customer information

7. Contact information

If you have any questions related to the Policy or other matters, we are always happy to assist you. Feel free to visit our Help Center or FAQs, or you can contact our customer service by emailing support@getpliant.com or by sending a message in the Pliant app chat.