

# eMoney Prohibited & Restricted Businesses excluding Cards - EEA and UK

Last updated: 29 Nov 2024

The following categories of businesses and business practices are prohibited (not accepted under any circumstances) or restricted (subject to ISXMoney® or PaidBy® approval) from using the ISXMoney® or PaidBy® services.

Further Prohibited and Restricted Business categories may be imposed by ISXMoney® or PaidBy®, through rules or requirements of our banking partners. In certain cases, businesses listed below may be prohibited or eligible for processing with explicit prior approval and conditions from ISXMoney® or PaidBy®.

Businesses that offer illegal products or services are never eligible to use the ISXMoney® or PaidBy® Services and will always be prohibited.

**Types of businesses listed are indicative, but not exhaustive. If you are uncertain as to whether your business is a Prohibited or Restricted Business, or have questions about how these requirements apply to you, please contact us at [sales@isxfinancial.com](mailto:sales@isxfinancial.com)**

## Restricted (High Risk) - Client Risk Categorisation

- **Clients where the Client, UBO, Director, or Authorized Signatory is a Politically Exposed Person (PEP);**
- **Clients associated with material adverse media reports** related to the client or other connected persons;
- **Clients from or connected to high-risk jurisdictions**, in accordance with the EU List of High-Risk Third Countries, the EU List of Non-Cooperative Jurisdictions for Tax Purposes, and the FATF's list of jurisdictions under increased monitoring (grey list)
- **Clients with complex ownership structures**, including those involving trusts or similar legal arrangements. Typically, a group structure is considered complex where there are at least three holding levels prior to having identified a physical/natural person as the UBO.;
- **Clients with an expected or actual annual credit turnover exceeding €40 million;**
- **FLYKK Clients with an expected or actual annual credit turnover exceeding €100 thousand;**
- **Clients whose transactional profiles primarily involve activity with high-risk jurisdictions;**
- **Clients with partial economic profiles** due to their startup status or pending agreements with declared parties;
- **Clients regulated and domiciled in offshore jurisdictions** outside the EEA or UK;
- **Sports clubs;**
- **Foundations and trust accounts, and accounts for limited partnerships;**

## Restricted (High Risk) - Client Risk Categorisation

- **EU-authorized and/or registered crypto-exchanges;**
- **Non-profit organisations** that operate in line with EU-level frameworks and Directives;
- **Clients previously rejected or terminated due to compliance issues**, provided the reasons for rejection have been adequately addressed;
- **Clients dealing with excessive amounts of cash** as part of their business;
- **For card clients** who are also card-acquiring merchants, **those with MCC codes classified as High Risk by VISA's Integrity Risk Programme (VIRP), Mastercard's Business Risk Assessment and Mitigation (BRAM) programme**, or any applicable card scheme rules will be designated as High Risk. A High Risk classification by any scheme will result in the client being treated as high risk across all schemes in our process;
- **For card clients, any client listed on Mastercard's Alert to Control High-Risk (MATCH) or Visa Merchant Screening Service (VMSS)** may be prohibited and requires thorough investigation. A listing on MATCH or VMSS does not automatically result in prohibition, as other factors may explain the client's entry on these databases. However, any accepted client appearing on MATCH or VMSS will be assigned a high-risk indicator, regardless of their MCC classification; and
- **Any other clients deemed high-risk for money laundering or terrorist financing**, as classified by the AML Risk Committee of ISXFEU.

## Prohibited

- **Shell companies** and **clients requesting anonymous or numbered accounts**;
- **Clients connected to individuals (both natural and legal persons)** convicted of crimes related to predicate offenses under the relevant laws of each jurisdiction;
- **Clients subject to specific sanctions** (e.g., EU, UK, UN, OFAC, local lists), including close family members, close associates, and related entities, irrespective of the percentage of ownership (direct or indirect) held by the sanctioned entities;
- **Clients engaged in sanctioned activities**, including connected entities or entities acting on behalf of sanctioned entities;
- **Clients from or connected to prohibited jurisdictions**, incorporating the EU List of High-Risk Third Countries, the EU List of Non-Cooperative Jurisdictions for Tax Purposes, and the FATF's lists of jurisdictions under increased monitoring (grey list) and subject to a call for action (black list)
- **Non-EU crypto exchanges** or clients involved in peer-to-peer trading of virtual assets, regardless of jurisdiction;
- **Clients engaging in business activities that require a license but are operating without one**;

## Prohibited

- **Clients engaged** in business activities related to deceptive marketing, intellectual property infringement, the manufacture or sale of counterfeit or unauthorized goods (including tobacco, e-cigarettes, e-liquids, weapons, ammunition, firearms, precious metals, gemstones, alcoholic products), hazardous materials (toxic, flammable, radioactive), online pharmacies, religious organisations, or child exploitation;
- **Clients whose economic profile or activity raises red flags**, including misalignment with their declared profile;
- **Clients who have issued shares in bearer form**;
- **Clients undergoing shareholding structure changes** without a clear economic rationale;
- **Clients whose UBOs' source of income and/or wealth**, and business backgrounds, are inconsistent with the entity's business activities;
- **Clients engaged in transactions involving unidentified counterparties** or payments for services inconsistent with their declared business activities or lacking a clear economic purpose.;
- **Clients prohibited from a particular service under the Scheme Rules of that service.**;
- **Clients that are uncooperative or seek excessive secrecy**; and
- **Any other clients whose risk is considered excessively high** for money laundering or terrorist financing and cannot be mitigated, as determined by the AML Risk Committee of ISXFEU.

# Cards Prohibited & Restricted Businesses excluding eMoney - EEA and UK

Last updated: 9<sup>th</sup> April 2025

For Cards further Restricted or Prohibited categories may apply based on Card Scheme rules or the requirements of our Banking Partners.

**Types of businesses listed are indicative, but not exhaustive. If you are uncertain as to whether your business is a Prohibited or Restricted Business, or have questions about how these requirements apply to you, please contact us at [sales@isxfinancial.com](mailto:sales@isxfinancial.com)**

## Restricted Categories - All Transactions


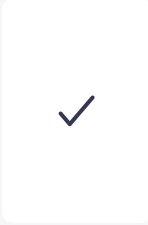

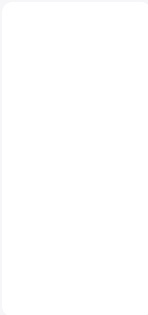

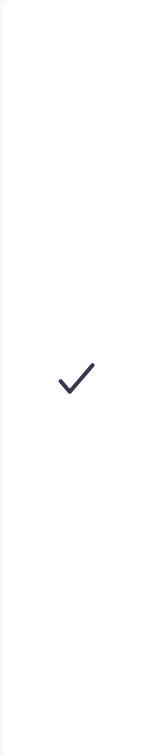
| MCC                         | Activity Requiring Registration   | Mastercard | VISA                                     |
|-----------------------------|---|------------|--|
| 7994 - Skill Game Merchants | <b>Skill games means:</b> <ul style="list-style-type: none"> <li>Game participants pay a game entry fee.</li> <li>The outcome of the game is determined by the skill of the participants rather than by chance.</li> <li>The winner of the game receives cash and/or prize of monetary value.</li> </ul>  | ✓          | ✓<br>Card Absent Transactions (MCC 5816) |
| 6051 - Quasi Cash Merchant  | <b>Cryptocurrency Transaction when a consumer uses an Account to:</b> <ul style="list-style-type: none"> <li>Directly purchase a digital asset recognized as a medium of exchange, unit of account, and store of value that uses cryptography to secure Transactions associated with the digital asset, control the generation of additional cryptocurrency units, and verify the transfer of funds;</li> <li>Purchase, sell, or trade such a digital asset by means of a digital currency, alternative currency, or virtual currency exchange platform.</li> </ul> | ✓          | ✓<br>Card Absent Transactions only       |

## Restricted Categories - All Transactions

| MCC  | Activity Requiring Registration   | Mastercard | VISA                                   |
|--|---|------------|--|
| 6211 - Securities – Brokers/Dealers  | <p><b>High Risk Securities Transaction occurs when a consumer uses an Account to purchase, sell, or broker a financial instrument, including but not limited to:</b></p> <ul style="list-style-type: none"> <li>• Contracts for difference (CFD)</li> <li>• Foreign exchange (Forex) currency options trading</li> <li>• Cryptocurrency options trading</li> <li>• Initial coin offerings (ICOs)</li> </ul> | ✓          | ✓<br><br>Card Absent Transactions only |
| 5967 - Direct Marketing—Inbound Telemarketing Merchants<br><br>7841 - (Mastercard only) Video Entertainment Rental | Purchase of adult content and services which may include but is not limited to subscription website access; streaming video; and videotape and DVD rentals and sales.   | ✓          | ✓                                      |
| 5966 - Direct Marketing—Outbound Telemarketing Merchant  | Sale of products or services using outbound telemarketing; examples include services such as unsolicited tech support desks or credit card protection   |            | ✓                                      |



## Restricted Categories - Card Absent Transactions

| MCC  | Activity Requiring Registration   | Mastercard  | VISA  |
|--|---|---|---|
| <b>7273 - Dating Services</b>  | Dating and escort-related services such as online classified ads that include escort services or monthly subscriptions to dating websites   |    |    |
| <b>9406 - Government Owned Lotteries</b>   | Government owned lotteries globally (excluding US)  |   |   |
| <b>6051 - Non-Financial Institutions</b><br><b>6012 - Financial Institutions</b> | <p><b>Cryptocurrency Transaction when a consumer uses an Account to:</b></p> <p>Directly purchase a digital asset recognized as a medium of exchange, unit of account, and store of value that uses cryptography to secure Transactions associated with the digital asset, control the generation of additional cryptocurrency units, and verify the transfer of funds.</p> <p>Purchase, sell, or trade such a digital asset by means of a digital currency, alternative currency, or virtual currency exchange platform.</p> |  |  |

## Restricted Categories - All Transactions

| MCC   | Activity Requiring Registration  | Mastercard | VISA   |
|---|--|------------|--|
| <b>7995 - Betting / Gambling</b>  | <p><b>Funding for games of chance such as placement of wagers on an outcome or purchase of chips at a gambling establishment e.g.</b></p> <p>Betting, Off-Track Betting, Wagers at Racetracks</p> <p>Lottery Tickets</p> <p>Raffles and prize draws</p> <p>Pay to Play games</p> | ✓          | ✓  |
| <b>5816 - Digital Goods—Games of skill</b>  | <p>Games of skill such as daily fantasy sports gaming where consumers pay a fee to enter, and the outcome of the game is determined by skill instead of luck</p>   |            | <p>✓</p> <p>Registration is only required for merchants processing US issued cards</p>     |
| <b>5122 - Drugs, Drug Proprietaries, Druggist Sundries</b><br><br><b>5912 - Drug Stores, Pharmacies</b> | <p>A non-face-to-face pharmaceutical Transaction occurs in a Card-not-present environment when a consumer uses an Account to purchase prescription medicines from a Merchant whose primary business is non-face-to-face selling of prescription drugs.</p>                       | ✓          | <p>✓</p> <p>Registration is required for all Card Absent and Cross Border transactions</p> |

## Restricted Categories - All Transactions

| MCC   | Activity Requiring Registration   | Mastercard | VISA   |
|---|---|------------|--|
| 5993 -<br>Tobacconists,<br>Cigar Stores<br>and Stands | <p>A non-face-to-face tobacco product Transaction occurs in a Card-not-present environment when a consumer uses an Account to purchase tobacco products including but not limited to</p> <ul style="list-style-type: none"> <li>cigarettes, cigars, loose tobacco</li> <li>electronic nicotine delivery systems e-cigarettes</li> </ul> | ✓          | ✓<br><br>Registration is only required for Card Absent Cross Border transactions |
| 4816 -<br>Cyberlockers                                | Cyberlockers and similar remote digital file-sharing services where uploaded content is accessible to the public or the service pays uploaders for content  |            | ✓<br><br>Registration is only required for merchants processing US issued cards  |
| 5968 -<br>Continuity/<br>Subscription<br>Merchant     | Negative option billing Merchants selling physical products   |            | ✓  |

## Prohibited

### Adult

Pornography (child abuse, bestiality, rape, or any other non-consensual sexual behaviour)

Escort Services / Sale or advertising of sexual services

Streaming including uploads of content that cannot be monitored or vetted

Gentlemen's clubs; Lap/erotic dancing / strip clubs

### Affiliations & Organisations

Entities that are deemed to promote/condone abuse, hatred, racism, religious persecution, terrorism, violence, or offensive content

### Counterfeit / Replica Goods / Intellectual Property infringement

**Counterfeit goods span across multiple industries including, but not limited to:**

- Apparel and accessories
- Automobile parts
- Consumer goods, toys, and electronics
- Computer hardware/software
- Illicit streaming devices
- Video Games
- Modification chips to break encryption of products
- Pharmaceuticals
- Medical devices and tests e.g. dentist drill bits, contraception, etc.
- Tobacco products

**Prohibited****Cyberlockers**

Provides rewards, cash payments or other incentives. Provides URL codes to uploaders to facilitate sharing and the incorporation of such links on third party indexing or linking websites

File owners are typically anonymous, not required to provide identifying information and not aware of the identity of users who have access to or view their files

**Financial Services**

Loan modification / Credit repair

Debt Collection (uncollectable debt)

Pawn shops

**Gambling / Gaming**

**Transactions from unlicensed financial product or trading platforms are prohibited, incorporating:**

- Contracts for Difference
- Binary options and synonymous products
- Rolling spot forex trading
- Financial spread betting
- Illegal or miscoded gambling

**High Pressure Sales**

Unsolicited vendors with immediate payment required or threat of price increases

Targeting of vulnerable customers and preying on worries and concerns

## Prohibited

### Illegal Activity

Any illegal product and or service is prohibited

Products sold must be legal in both the merchant's jurisdiction and the consumers jurisdiction if goods are despatched cross border

Illegal products / services (list below is not exhaustive);  
Designer drugs/ Street drugs which are synthetic, chemical analogue of controlled substances, intended to imitate their psychoactive or stimulating effects e.g. Peptide, K2, Salvia Divinorum and may be marketed as incense/potpourri/bath salts.

Sites selling pharmaceuticals without a prescription (cancer drugs, steroids, etc.)

Peripheral products / services that support illegal activities (drug paraphernalia including seeds for cannabis plants etc.)

Wildlife Trade

Mail Order Brides

Poisonous or hazardous materials

Surrogacy services

Trade of weapons, ammunitions, military armaments, explosive devices, and firearm parts

Human remains and body parts

Human trafficking

Child exploitation

**Prohibited****Investment Opportunities**

Pyramid / Ponzi type schemes with reliance upon a continual stream of new participants.

Investment schemes that offer or promise high rewards

Get rich quick schemes

**Lifetime Products**

One off payments for e.g.

Timeshares

Lifetime Guarantees

Lifetime Memberships / clubs

**Medical Diagnostics / Devices**

Sale of products that have not been approved or verified by an appropriate regulatory body

**Nutraceuticals**

Sale of products that make health claims, or performance enhancements, that have not been approved or verified by an appropriate regulatory body

**Penny Auctions**

Purchase of bid credits

Open ended auctions

Repeat / automated bids

**Sanctions**

Goods and services likely to breach regulatory sanctions and embargoes; customers and or jurisdictions

## Prohibited

### Shell Banks and Companies / Bearer shares

Banks or companies established to obscure the origin of funds

### Potentially Deceptive Marketing

Merchants engaged in any form of deceptive marketing that may have the effect of confusing, misleading, or defrauding cardholders, including but not limited to:

Processing transactions without the explicit consent of the cardholder

Making indirect or direct false claims about a product or service

Failing to disclose material information about a product or service