



Apaylo Partner Due Diligence

APAYLO FINANCE TECHNOLOGY INC.

Company: Trackon Canada Private Ltd

Principal Contact: Ayushi Patel, Operations Manager

Date: August 11, 2021

Due diligence requirements for partnership with Apaylo Finance Technology Inc (“Apaylo”).

Due diligence on contract partners is an obligation of Apaylo's partner financial entities under Canada PCMLTF regulation.

Please provide the documents and information requested below. If a document or a piece of information is publicly available, please provide a direct, functional, and current link to the location of the information or document.

If you are unable to provide any one of the requirements, or if you feel a requirement is not applicable to you, please indicate N/A and/or your reasoning in the comments area.

Requirement	Comments
1 Corporate Overview	
a Certificate of corporate status OR Certificate of incorporation	Attached <input checked="" type="checkbox"/>
b List of all parent and subsidiary companies OR Detailed company org chart	Attached <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Comments: _____
c List of any Doing Business As (DBA) names with legal DBA records where available	DBA : <u>DBA as Paypenny</u> Document Attached _____ N/A <input type="checkbox"/>
d List of all directors AND executive officers AND resumes (or LinkedIn) for each	Attached <input checked="" type="checkbox"/> LinkedIn URL (S) <u>Document Attached</u> _____
e Name and address of individuals who own or control, directly or indirectly, ≥25% of the company	Jaspreet Singh: 34% 4440 5 ST NW Edmonton Alberta T6T0Z9 Nitan Pal Singh: 25% H NO.563,cheema nagar,Jalandhar,Punjab India 144001 Prem Bhalla: 25% H no 149,Panchsheel Avenue,Jalandhar cantt Punjab, India 144005

Requirement	Comments
f Photo ID with date of birth of individuals who own or control, directly or indirectly, ≥25% of the company	Attached <input checked="" type="checkbox"/>
g Please confirm if your company is acting for a 3 rd party	Yes <input type="checkbox"/> Please provide name of the Parent company <hr/> No <input checked="" type="checkbox"/>
2 Financial Overview	
a Please confirm if you have funds readily available to cover chargebacks of amount greater than the contracted reserve when required by an authorized entity.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Please describe how you plan to fund these chargebacks <hr/>
b Has the company ever filed for bankruptcy?	Yes <input type="checkbox"/> Please state the year when that happened <hr/> No <input checked="" type="checkbox"/>
c A copy of Canadian Bank settlement information (proof of bank account)	Attached <input checked="" type="checkbox"/>

Requirement	Comments
3 Operations Overview	
a List all countries (in addition to Canada) where the company does business	NO
b List all current and previous (2 years) financial institutions with which the company has done business.	Current <u>NONE</u> Previous _____
c Does the company currently have anti-money laundering and Know-your-client policy / procedures in place?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Please state when this will be in place _____
d Does the company currently have policy / procedures in place for compliance with the Personal Information and Electronic Documents Act [PIPEDA]?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Please state when this will be in place _____
e Is the company currently registered OR plans to register as a Money Services Business (MSB) in Canada?	Yes <input checked="" type="checkbox"/> Proof of registration attached <input checked="" type="checkbox"/> OR state the action plan with timeline _____ No <input type="checkbox"/> Please state if you did OR will consult a business registration professional to confirm that your business is not an MSB? _____

Requirement	Comments
f Have the company and/or individuals who own or control, directly or indirectly, ≥25% of the company been triggered for regulatory review?	<p>No <input checked="" type="checkbox"/></p> <p>Yes <input type="checkbox"/> Please elaborate</p> <hr/> <hr/>

I hereby confirm that all information provided in this document is true and accurate.

Company: Trackon Canada Private Ltd

Authorized Signature: JASPREET SINGH

I have authority to legally bind the corporation.

Name: Jaspreet Singh

Title: Director

Date: 12-Aug-2021