



ACCOUNTANTS
TAX ADVISORS

STATUTORY AUDITORS
DUE DILIGENCE

DISPUTE RESOLUTION
M & A ADVISORY

WEALTH PROTECTION
SECURITY TRUSTEES

Independent auditor's report on compliance to Her Majesty's Revenue & Customs in respect of E-Pay International Limited, for the period started 1 October 2018 and ended 30 September 2019.

Part 1: Auditor's Opinion on Anti-Money Laundering Compliance

We report in respect of E-Pay International Limited ('the firm') on the matters set out below for the period started 1 October 2018 and ended 30 September 2019 ('the period').

Our report has been prepared and is addressed to Her Majesty's Revenue & Customs ('HMRC') in its capacity as the firm's Anti-Money Laundering Supervisor.

Basis of opinion

We have carried out such procedure as we considered necessary for the purposes of this report in accordance with:

1. The European Union 4th and 5th Anti-Money Laundering Directive issued by the European Parliament,
2. Terrorism Act 2000,
3. Financial Services and Markets Act 2000
4. Anti-Crime, Terrorism and Security Act 2001
5. Proceeds of Crime Act 2002
6. Serious Organised Crime and Police Act 2005
7. Counter-Terrorism Act 2008
8. Money Laundering, Transfer of Funds (Information to the Payer) Regulations 2017

Together the "Regulations".

This opinion relates only to the period and should not be seen as providing assurance as to any future position, as changes to systems or control procedures may alter the validity of our opinion.

Opinion

In our opinion:

The firm has maintained policies, procedures and systems adequate to enable it to comply with the Regulations throughout the period and we, its compliance auditor, are satisfied that no material deficiencies exist. Where non-material deficiencies exist, those will be remedied within a reasonable time.

The policies, procedures and systems are adequate to cover:

1. Risk management practices
2. Internal controls and reporting
3. Customer due diligence
4. Reliance and record keeping

61/63 Crockhamwell Road,
Woodley, Reading, RG5 3JP

Tel: 0118 969 7884
Fax: 0118 324 0004

Email: contact@inchmead.com
Web: www.inchmead.com



ACCOUNTANTS
TAX ADVISORS

STATUTORY AUDITORS
DUE DILIGENCE

DISPUTE RESOLUTION
M & A ADVISORY

WEALTH PROTECTION
SECURITY TRUSTEES

5. Monitoring and management of compliance
6. Supervision and training

A handwritten signature in black ink, consisting of a large, stylized 'G' and 'A' intertwined, with a horizontal line extending to the left and a vertical line extending downwards.

Graham Andrew Arnott
Partner: Complex & Regulatory Matters
Inchmead Limited

Date: 15 October 2019