



Acceptable Use Policy

VERSION 1.0 · EFFECTIVE FROM 1 SEPTEMBER 2026 · LAST REVIEWED 23 JULY 2026

Note: This English version is a machine translation provided for convenience. The German original is the legally binding version.

This policy governs what you may and may not do when using the CashXChain™ platform. It forms part of our [Website and Platform Terms of Use](#) and, once you contract for the service, our [AGB](#). By accessing or using the platform you agree to this policy.

1. Intended Use

The CashXChain platform is designed for legitimate business-to-business payment and value transfer purposes. It enables businesses to initiate and receive cross-border payments, to integrate payment functionality into enterprise systems through the API, and to access transaction records for accounting purposes.

To use the platform, your business must be legally registered in a jurisdiction in which we operate, must complete our business identity and ownership verification process before initiating transactions, and must use the platform solely in the name and for the benefit of the registered business entity.

2. Permitted Uses

You may use the platform for:

- Sending and receiving cross-border business payments on behalf of your registered entity, including payments to suppliers, contractors, and service providers in the corridors in which the platform operates.
- Integrating payment initiation and receipt functionality into your own enterprise systems through the published API, subject to our separate [API Partner Terms](#).
- Accessing transaction records and accounting exports for the purpose of lawful financial reporting and tax compliance.
- Managing payment flows to sub-contractors or suppliers where you hold documented authority to initiate payments on their behalf.

3. Prohibited Uses

The following activities are strictly prohibited. This list is not exhaustive. We may prohibit additional activities where we reasonably determine that they create legal, regulatory, financial crime, operational, or reputational risks. If you are uncertain whether a use is permitted, contact compliance@cashxchain.com before proceeding.

Financial crime: Using the platform to launder proceeds of crime, to finance terrorism or the proliferation of weapons of mass destruction, or to conduct any activity that violates the German Money Laundering Act ([Geldwäschegesetz](#) [↗] – GwG), EU Directive 2018/843 on the prevention of money laundering, or the

FATF Recommendations.

- Initiating, receiving, or facilitating transfers that involve a person or entity whose assets are subject to a freeze order under EU, UN, or applicable national sanctions, including transfers in which a sanctioned party is the ultimate beneficiary of funds, even where they are not the named counterparty in the instruction.
- Structuring transactions — that is, splitting payments or timing transfers to avoid applicable reporting thresholds or to circumvent monitoring obligations.
- Providing inaccurate or false information about the originator, beneficiary, or purpose of a payment for the purpose of evading the information requirements under [Regulation \(EU\) 2023/1113](#) [↗].
- Tax evasion, customs fraud, or any deliberate concealment of assets from competent tax or customs authorities.

Prohibited business activities:

Businesses and activities in the following categories are not permitted to use the platform: sale of unlicensed weapons or military equipment; trade in controlled substances or narcotics and equipment for producing or concealing them; unlicensed gambling or betting operations; unlicensed money services, payment intermediaries or currency exchanges; adult services and sexually explicit content; businesses that promote or facilitate pyramid schemes, Ponzi schemes, recruitment-based multi-level marketing, or unregistered investment products; businesses operating in jurisdictions subject to comprehensive EU or UN trade sanctions at the time of the transaction; beneficial ownership arrangements designed to conceal the true owner of funds from our verification processes.

Our [Prohibited and Restricted Businesses List](#) is the authoritative and complete statement of the businesses and activities that may not use the platform, or may use it only on conditions. It forms part of this policy, is updated from time to time, and should be reviewed periodically by users of the platform.

Technical misuse: Attempting to access accounts, infrastructure, or data you are not authorised to access. Introducing malicious code, conducting denial-of-service attacks, or exploiting security vulnerabilities. Using automated tools to access the platform outside the terms of an authorised API agreement. Circumventing transaction controls, rate limits, or security features implemented to satisfy regulatory obligations.

4. Your Obligations Regarding Payment Information

When you initiate a transfer, you confirm that the payment account identifier you have provided for the beneficiary is correct and belongs to the person or entity you intend to pay. Where our platform offers a payee name verification service and that service indicates a discrepancy between the name you have provided and the name associated with the account identifier, your decision to proceed despite that notification affects the allocation of liability between you and us under applicable law. Details are set out in our AGB.

Where a transfer involves crypto-asset elements, including stablecoin-linked payment rails, you must provide accurate originator and beneficiary information as required under Regulation (EU) 2023/1113; failure to provide this information may result in the transfer being delayed or declined.

5. Enforcement

Our role. CashXChain UG (haftungsbeschränkt) is the operator of the platform. It is not an obliged entity (Verpflichteter) within the meaning of § 2 GwG, has no direct reporting obligation under § 43 GwG, and no freezing obligation under § 46 GwG. Those obligations are carried out by our licensed Partner institutions within their own regulatory perimeter. The measures in this section are contractual platform-access controls based on our rights as platform operator, not regulatory actions.

Grounds for action. We may suspend or restrict your access to the platform, block or decline transactions, close your account, or refuse service where we reasonably determine that any of the following applies:

- a suspected breach of this policy, our AGB or Website and Platform Terms of Use, or applicable law;
- suspected involvement in fraud, money laundering, terrorism financing, sanctions violations, or other financial crime;
- a request or requirement from a licensed Partner or its regulator;
- an order or request from a competent authority;
- a reputational, security, or integrity risk to the platform or its users;
- KYB or verification issues, including failed re-verification, false information, or missing beneficial-ownership disclosure;
- payment default, chargeback abuse, or excessive dispute activity;
- at our reasonable discretion, on notice, for any other legitimate business reason.

How we act. Depending on the severity of the circumstances, we may (i) suspend access immediately and without prior notice for good cause (aus wichtigem Grund) in serious cases, (ii) suspend access with reasonable notice, or (iii) terminate the business relationship on the contractual notice period set out in our AGB. We will act proportionately to the circumstances.

Funds. CashXChain does not hold your funds. Where funds are held before or after a transfer, they sit with the licensed Partner institution. If your access is suspended or terminated, you may need to address the recovery or release of any funds directly with that Partner.

Transaction holds and tipping-off. Where a transaction must be held or delayed under § 46 GwG following a suspicious-activity report, this is carried out by the licensed Partner as the obliged entity. Where the tipping-off prohibition in § 47 GwG or equivalent law applies, neither we nor the Partner may inform you that a report has been made or that an investigation is underway.

Voluntary reporting. While CashXChain is not a Verpflichteter under § 2 GwG and has no direct FIU reporting obligation, we reserve the right to make voluntary reports to competent authorities — including criminal complaints under § 158 StPO and voluntary suspicious-activity reports under § 261 (8) StGB — where we identify indicators of money laundering, terrorism financing, sanctions evasion, fraud, or other serious criminal activity. We do so in good faith and independently of any regulatory obligation. Where the law prevents us from informing you that such a report has been made, we will not do so.

Review requests. If your account is suspended or restricted, you may contact us at compliance@cashxchain.com to request a review of the decision. We may be unable to provide detailed reasons where disclosure would violate applicable law, regulatory requirements, confidentiality obligations, or restrictions relating to ongoing investigations.

Updates

We may revise this policy in response to regulatory changes or changes to our services. The current version will always be published on our Legal Center. For material changes, notice will be provided in accordance with our AGB. Continued use of the platform following a revision constitutes acceptance.