



NOVEBA TERMS OF BUSINESS

These Terms of Business is provided as part of our commitment to provide clear information to customers for the services we offer.

1 About us

1.1 Our legal name is Noveba Limited ("Noveba"). Our registered office is at 71-75 Shelton Street, Covent Garden, London WC2H 9JQ, United Kingdom and our company registration number is 11610200.

1.2 Noveba is authorised as an E-Money Institution (EMI) by the Financial Conduct Authority since 16.08.2019.

Status: Authorised Electronic Money Institution (Reference number: 900924)

This is a firm that has FCA permission to issue electronic money (e-money) and provide payment services. This firm has requirements or restrictions placed on the financial services activities that it can operate. Requirements or restrictions can include suspensions. See the requirements applying to the firm.

1.3 You may contact us at any time by writing to us at the above address or sending an email to our Support Team (support@noveba.com). Contact details may be found on the FAQ section of our website.

2 Regulated activities

2.1 Noveba is authorised to provide the following e-money and payment services:

Regulators

This table shows the former and current regulators of this firm, in the UK and in other European Economic Area (EEA).

Regulator Name: **Financial Conduct Authority**

Effective From: **16/08/2019**

Permission

Noveba has permission to provide certain regulated products and services.

- a) Services enabling cash placement on a payment account
- b) Services enabling cash withdrawals from a payment account
- e) Issuing payment instruments or acquiring payment transactions
- f) Money remittance
- h) Issuing Electronic Money
- Other services such as:
 - (a) the provision of payment services;
 - (b) the provision of operational and closely related ancillary services, including–
 - (i) ensuring the execution of payment transactions;
 - (ii) foreign exchange services;
 - (iii) safe-keeping activities; and
 - (iv) the storage and processing of data;
 - (c) the operation of payment systems; and
 - (d) business activities other than the issuance of electronic money, subject to any relevant European Union or national law.



3 Codes of conduct

3.1 Noveba is subject to the legislative requirements within the Electronic Money Regulations 2011 and Payment Service Regulations 2017.

4 Fees and charges

4.1 Noveba charges its customers fees and charges in connection with the products and services provided by it. Information on Fees and Charges can be found in our Fees section of the website. Fees and charges may be amended from time to time by Noveba.

5 Data Protection Notice

5.1 The personal information requested from you is required for account opening checks. We will gather and process your personal data in compliance with the Data Protection Act 2018.

6 Complaints

6.1 You may make a complaint by any of the following methods:

- In writing, whether by letter, or email, or
- verbally.

6.2 Your complaint will be fully investigated by Noveba. An acknowledgment letter will be sent to you upon receipt of your complaint and we will provide you with regular written updates. If you are dissatisfied with the outcome or if the complaint is not resolved within 35 business days, you are entitled to refer your complaint to the Financial Ombudsman Service, Exchange Tower, London, E14 9SR as outlined within our Complaints Procedure.

7 Changes to Terms of Business

7.1 Where there are any material changes to these Terms of Business we will give you notice of any proposed change by any combination of an e-mail, posting a notice on our Website or through the Noveba App.

7.2 The Terms of Business is effective from 14th October 2019.

Appendices:

- A. List of Prohibited Businesses
- B. List of Prohibited Jurisdictions



APPENDIX A

Jurisdictions / Territories with restrictions of service provision:

UPDATED: December 12, 2019

Customers (legal and physical persons) and/or Transactions that have a direct and clear link by entity / asset ownership, UBO, business ties and obligations or any other form of strong relationship to the following jurisdictions, have the following service supply status:

Country / Territory	Client Account opening and maintaining	Transactions (incoming / outgoing / exchange)	Notes:
Abkhazia	PROHIBITED	PROHIBITED	
Afghanistan	PROHIBITED	PROHIBITED	
Andorra	PROHIBITED	PROHIBITED	
Anguilla	PROHIBITED	PROHIBITED	
Antigua and Barbuda	PROHIBITED	PROHIBITED	
Armenia	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis, excluding Nagorno-Karabakh/Artsakh region.
Armenia (Nagorno-Karabakh/Artsakh region)	PROHIBITED	PROHIBITED	
Aruba	PROHIBITED	PROHIBITED	
Azores	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis
Bahamas	PROHIBITED	PROHIBITED	
Bahrain	PROHIBITED	PROHIBITED	
Barbados	PROHIBITED	PROHIBITED	
Belarus	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis
Belize	PROHIBITED	PROHIBITED	
Bermuda	PROHIBITED	PROHIBITED	
British Virgin Islands	PROHIBITED	PROHIBITED	
Brunei	PROHIBITED	PROHIBITED	
Burundi	PROHIBITED	PROHIBITED	
Cayman Islands	PROHIBITED	PROHIBITED	
Central African Republic	PROHIBITED	PROHIBITED	
Cook Islands	PROHIBITED	PROHIBITED	
Costa Rica	PROHIBITED	PROHIBITED	
Cuba	PROHIBITED	PROHIBITED	
Democratic Republic of the Congo	PROHIBITED	PROHIBITED	
Djibouti	PROHIBITED	PROHIBITED	
Dominica	PROHIBITED	PROHIBITED	
Ecuador	PROHIBITED	PROHIBITED	
Egypt	PROHIBITED	PROHIBITED	
Eritrea	PROHIBITED	PROHIBITED	
Ethiopia	PROHIBITED	PROHIBITED	
Gaza Strip	PROHIBITED	PROHIBITED	
Gibraltar	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis
Grenada	PROHIBITED	PROHIBITED	
Guatemala	PROHIBITED	PROHIBITED	

Guernsey, Sark, Alderney	PROHIBITED	PROHIBITED	
Guinea	PROHIBITED	PROHIBITED	
Haiti	PROHIBITED	PROHIBITED	
Iran	PROHIBITED	PROHIBITED	
Iraq	PROHIBITED	PROHIBITED	
Island of Saint Helen	PROHIBITED	PROHIBITED	
Isle of Man	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis
Ivory Coast (Côte D'Ivoire)	PROHIBITED	PROHIBITED	
Jamaica	PROHIBITED	PROHIBITED	
Jersey	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis
Kenya	PROHIBITED	PROHIBITED	
Kuwait	PROHIBITED	PROHIBITED	
Lebanon	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis
Liberia	PROHIBITED	PROHIBITED	
Libya	PROHIBITED	PROHIBITED	
Liechtenstein	PROHIBITED	PROHIBITED	
Macau	PROHIBITED	PROHIBITED	
Madeira	ALLOWED	ALLOWED*	* subject to EDD on a case by case basis
Maldives	PROHIBITED	PROHIBITED	
Mali	PROHIBITED	PROHIBITED	
Marshall Islands	PROHIBITED	PROHIBITED	
Mauritius	PROHIBITED	PROHIBITED	
Moldova (including Transistria)	PROHIBITED	PROHIBITED	
Monaco	PROHIBITED	PROHIBITED	
Montserrat	PROHIBITED	PROHIBITED	
Myanmar (ex-Burma)	PROHIBITED	PROHIBITED	
Nauru	PROHIBITED	PROHIBITED	
Netherlands Antilles	PROHIBITED	PROHIBITED	
New Caledonia	PROHIBITED	PROHIBITED	
Niue	PROHIBITED	PROHIBITED	
North Korea	PROHIBITED	PROHIBITED	
Northern Cyprus	PROHIBITED	PROHIBITED	
Pakistan	PROHIBITED	PROHIBITED	
Panama	PROHIBITED	PROHIBITED	
Russian Federation	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis, (excluding territories with disputed / occupied status and those falling under sanctions regime)
Russian Federation – Crimea Region	PROHIBITED	PROHIBITED	
Saint Kitts and Nevis	PROHIBITED	PROHIBITED	
Saint Pierre and Miquelon	PROHIBITED	PROHIBITED	
Saint Vincent and the Grenadines	PROHIBITED	PROHIBITED	
Samoa	PROHIBITED	PROHIBITED	
San Marino	PROHIBITED	PROHIBITED	
Seychelles	PROHIBITED	PROHIBITED	
Sierra Leone	PROHIBITED	PROHIBITED	
Somalia	PROHIBITED	PROHIBITED	
South Ossetia	PROHIBITED	PROHIBITED	
South Sudan	PROHIBITED	PROHIBITED	
Sudan	PROHIBITED	PROHIBITED	
Syria	PROHIBITED	PROHIBITED	



Tahiti	PROHIBITED	PROHIBITED	
Tonga	PROHIBITED	PROHIBITED	
Tunisia	PROHIBITED	PROHIBITED	
Turks and Caicos Islands	PROHIBITED	PROHIBITED	
U.S. Virgin Islands	PROHIBITED	PROHIBITED	
Ukraine	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis, (excluding territories with disputed / occupied status and those falling under sanctions regime)
Ukraine – Donetsk & Luhansk region territories	PROHIBITED	PROHIBITED	
United Arab Emirates	PROHIBITED	ALLOWED*	* subject to EDD on a case by case basis
United States of America –	PROHIBITED	ALLOWED*	* subject to EDD Applies to clients with declared citizenship / residency / tax residency and any other strong link to the United States of America and its controlled territories worldwide
Uruguay	PROHIBITED	PROHIBITED	
Vanuatu	PROHIBITED	PROHIBITED	
Venezuela	PROHIBITED	PROHIBITED	
West Bank	PROHIBITED	PROHIBITED	
Yemen	PROHIBITED	PROHIBITED	
Zimbabwe	PROHIBITED	PROHIBITED	
Army / Naval or any other forms of military bases or armed forces' locations	PROHIBITED	PROHIBITED	<u>Applicable worldwide, regardless of the controlling country / organisation</u>

The list above is subject to regular change / update.

Important:

Being a part of the global financial system, Noveba Limited relies on external financial/payment partners for performing certain operations (including transfers and accounts). It is Noveba's obligation to adhere to partners' policies and terms of business, thus, Noveba reserves the right to refuse its Clients certain actions and prohibit transactions as required by its partners terms and conditions.

APPENDIX B

UPDATED: December 12, 2019

Noveba Limited will not provide services to legal and physical entities, operating / related to the following sectors / industries:

Type of Business	Reason	Accepted by Noveba?
Cryptocurrency trading	High Risk / High volatility	NO
Anonymous or Numbered Accounts, Shell Banking	Restricted / High-risk	NO
Cash and Check Handling: Check Cashing, Deposit Taking, Cash Transfer	Restricted / High-risk	NO
Credit repair, Debt Restructuring	Restricted / High-risk	NO
Debt recovery, Debt settlement, Debt Collections	Restricted / High-risk	NO
Gambling and Gaming	Restricted / High-risk	NO
Tobacco, e-cigarettes and e-liquid	Restricted / High-risk	NO
Operating a business that requires a license or special permit without obtaining such license (i.e. Unregulated Auction Houses)	Restricted / High-risk	NO
Production of Adult or Violent content	Restricted / High-risk	NO
Production or Distribution of Offensive Weapons: Ammunition, Firearms, Explosives, Complex Weapons (i.e. guided missiles), Poisons	Restricted / High-risk	NO
Transactions involving Human Organs	Restricted / High-risk	NO
Sanctioned individuals and entities	Restricted	NO
Services of Psychic services	Other	NO
Financial Pyramid or Ponzi Schemes	Illegal	NO
Any industry known to be an illegal industry in it's local jurisdiction or the UK	Illegal	NO
Illegal Drugs and Narcotics	Illegal	NO
The sale or distribution of stolen goods (including digital and virtual goods), counterfeit goods and violation of intellectual property, or items that violates individual privacy (revenge porn)	Illegal	NO
Selling, hosting, distributing, producing or promoting offensive materials, including materials that incites or promotes racial hatred or discrimination based on gender, race, religion, national origin, physical ability, sexual orientation, or age	Illegal	NO
Regulated Payment Service Providers / Money Service Business	Regulated / High Risk	Applications can be considered subject to separate EDD / KYB / KYCC and risk analysis.
Alternative / informal / unregulated payment systems, e.g. Hawala, Chit, Poey Kuan, Hundi, Fei Chi 'Ien"	High Risk / Illegal	NO