



## 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)  
(Reference: <https://register.fca.org.uk/s/firm?id=0010X00004JBGVaQAP>)  
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 January 31, 2022.

#### Appendices:

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



## APPENDIX A

### Jurisdictions / Territories with restrictions of service provision:

UPDATED: May 24, 2021

Customers 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. State-related entities – prohibited.       |
| 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,<br>(excluding territories with disputed /<br>occupied status and those falling under<br>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<br>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: May 24, 2021

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

| Type of Business  | Reason                      | Accepted by Noveba?  |
|---|-----------------------------|--|
| Cryptocurrency trading  | High Risk / High volatility | Applications can be considered subject to separate EDD / KYB / KYCC / risk analysis and subject to banking provider's approval |
| Anonymous or Numbered Accounts, Shell Banking ("Shell bank" means a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).   | 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 / risk analysis and subject to banking provider's approval |
| Alternative / informal / unregulated payment systems, e.g. Hawala, Chit, Poey Kuan, Hundi, Fei Chi 'Ien"  | High Risk / Illegal         | NO   |