

NB PAY FZCO  
Policy on Prevention of Money Laundering  
and Terrorist Financing

**DOCUMENT OVERVIEW:**

<b>Title:</b>	Policy on Prevention of Money Laundering and Terrorist Financing
<b>Security Classification:</b>	HIGH
<b>Status:</b>	APPROVED
<b>Version control:</b>	4.0
<b>Owner:</b>	Yury Morozov, General Manager
<b>Approved by:</b>	Yury Morozov, General Manager

<b>Company name:</b>	NB PAY FZCO
<b>Company number:</b>	DSO-FZCO-13633
<b>Address:</b>	Dubai Silicon Oasis, DDP, Building A1, Dubai, UAE
<b>Phone number:</b>	+971 5888 55170
<b>Email:</b>	info@nbp.ae
<b>Website:</b>	www.nbp.ae

## Table of Contents

1. Abbreviations and definitions .....	3
2. Policy statement .....	8
3. Purpose .....	9
4. Document hierarchy .....	10
5. Scope .....	11
6. Outsourcing arrangements.....	12
7. AML/CFT related Roles and Responsibilities .....	13
7.1. CEO.....	13
7.2. CEO acting as the MLRO.....	13
7.3. Employees.....	14
8. How NB PAY FZCO deals with ML/TF .....	15
9. NB PAY FZCO Customers .....	17
10. Politically exposed persons.....	18
11. Sanctions screening .....	19
12. Geography.....	20
13. Risk-based approach .....	21
13.1. High Risk Customers and Situations.....	21
14. Other provisions .....	22
14.1. Records Management.....	22
14.2. Updating .....	23
14.3. Suspicious Activity/Transaction Reporting .....	24
14.4. Disciplinary Action .....	25
14.5. Recovery Action .....	25
15. Version History .....	26

## 1. Abbreviations and definitions

Abbreviation	Definition
AML/CFT	<ul style="list-style-type: none"> <li>● Anti-Money Laundering refers to the laws, regulations and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. Though anti-money laundering laws cover a limited range of transactions and criminal behaviour, their implications are far-reaching.</li> <li>● Combating the Financing of Terrorism is a set of government laws, regulations, and other practices that are intended to restrict access to funding and financial services for those whom the government</li> </ul>

	designates as terrorists. By tracking down the source of the funds that support terrorist activities, law enforcement may be able to prevent some of those activities from occurring.
AML/CFT Framework	The following documents comprise the AML/CFT Framework: <ul style="list-style-type: none"> <li>● AML/CFT Policy;</li> <li>● AML/CFT Manual of Procedures;</li> <li>● KYC Questionnaires.</li> </ul>
AML/CFT Law	Decree Federal Law No. (20) of 2018 on Anti-money Laundering and Combating the Financing of Terrorism and Illegal Organisations
BO / UBO	Beneficial owner is any natural person who owns the Customer (a legal person or a foreign undertaking) or controls the Customer and/or the natural person on whose behalf a transaction or activity is being conducted. The beneficial owner shall include: <ol style="list-style-type: none"> <li>1) in the case of a legal person: <ul style="list-style-type: none"> <li>● the natural person who owns or manages the legal person through direct or indirect ownership of a sufficient percentage of the shares or voting rights in that legal person, including through bearer shareholdings, or through control via other means, other than public limited liability companies whose securities are traded on regulated markets that are subject to disclosure requirements consistent with the UAE legislation or subject to equivalent international standards. A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by a natural person shall be an indication of direct ownership. A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by an undertaking, which is under the control of a natural person(s), or by multiple undertakings, which are under the control of the same natural person(s), shall be an indication of indirect ownership;</li> <li>● if no person under the point above is identified, or if there is any doubt that the person identified is the beneficial owner, the natural person who holds the position of senior managing official in the legal person who has been identified;</li> </ul> </li> <li>2) in the case of a trust, all following persons: <ul style="list-style-type: none"> <li>● settlor/settlors;</li> <li>● trustee/trustees;</li> <li>● protector/protectors, if any;</li> </ul> </li> </ol>

	<ul style="list-style-type: none"> <li>natural persons benefiting from the legal person or entity not having legal personality, or where such persons have yet to be determined, persons in whose main interest that legal person or entity not having legal personality is set up or operates;</li> <li>any other natural person exercising ultimate control over the trust by means of direct or indirect ownership or by other means;</li> </ul> <p>3) in the case of a legal person which administers and distributes funds, an entity similar to a trust – the natural person holding an equivalent position to that referred to in point 2 of this paragraph.</p>
CEO	General Manager of 'NB PAY FZCO'
Customer	Customer is a natural or legal person performing monetary operations or concluding transactions with a financial institution or another obliged entity. Any foreign state organisation that is recognised as a legal entity under laws of the UAE or a foreign state shall also be considered to be a legal person.
Customer Risk Scoring Procedures	<p>Procedures related to the scoring process of individual and corporate Customers of UAB 'NB PAY FZCO':</p> <ul style="list-style-type: none"> <li>Corporate Customer Risk Scoring Procedure;</li> <li>Individual Customer Risk Scoring Procedure.</li> </ul>
DOB	Date of Birth
EBA	IFZA is a regulatory authority of the UAE headquartered in Dubai. Its activities include conducting stress tests on International banks to increase transparency in the International financial system and identifying weaknesses in banks' capital structures.
IFZA	Integrated Free Zone Authority UAE
FI	Financial Institution
KYC	Know Your Customer is an essential requirement for how the Company determines who is using its systems and services and to what end. By obtaining and verifying information about the Customers, the Company is not only mitigating risks related to ML/TF but also performing a crucial requirement in preventing its system and services from being used to conceal illegally-obtained funds or be used as a vehicle for TF purposes.
KYC Procedure	Know Your Customer Procedure of 'NB PAY FZCO'
ML	<p>Money laundering means:</p> <ul style="list-style-type: none"> <li>conversion or transfer of property, in the knowledge that such property is derived from a criminal act or from involvement in such</li> </ul>

	<p>an act, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such a criminal act to evade the legal consequences of this act;</p> <ul style="list-style-type: none"> <li>• concealment or disguise of the true nature, origin, source, location, disposition, movement, rights with respect to, or ownership of property, in the knowledge that such property is derived from a criminal act or from involvement in such an act;</li> <li>• acquisition, possession or use of property, in the knowledge, at the time of acquisition/transfer, that such property was derived from a criminal act or from involvement in such an act;</li> <li>• preparation, attempts to commit and association to commit any of the actions described above.</li> </ul>
MLRO	Money Laundering Reporting Officer is the first point of contact for issues which are relevant to ML matters responsible for reporting to FCIS Suspicious Transactions and Suspicious activities detected, who has sufficient seniority, possessing sufficient knowledge of NB PAY FZCO ML/TF risk exposure and responsible for taking decisions affecting its risk exposure. The duties of MLRO are performed by CEO.
OFAC	Office of Foreign Assets Control of the UAE
OFSI	Office of Financial Sanctions Implementation helps to ensure that financial sanctions are properly understood, implemented and enforced in the UAE.
PEP	Politically exposed persons are the natural persons who are or who have been entrusted with prominent public functions as well as their family members or close associates of such persons.
Policy	Policy on Prevention of Money Laundering and Terrorist Financing of 'NB PAY FZCO'
SAR/STR	A suspicious transaction report or a suspicious activity report is filed by a financial institution or, by a concerned citizen, to the local FCIS if they have reasonable grounds to believe that a transaction is related to criminal activity.
SAR/STR Procedure	Suspicious Activity/Transaction Reporting Procedure
Suspicious Activity	Any activity that is out of the ordinary or a deviation from expectations. Such activity may be referred to as Suspicious Activity if it gives rise to a suspicion that the legal or natural person is attempting to hide something by their actions e.g. transactions, communication including

	lack thereof, as well as cooperation during the on-boarding process or any investigation into a suspicious transaction.
Suspicious Transaction	Monetary Operation involving a property which is suspected to have been received, either directly or indirectly, from a criminal act or involvement in such an act and / or is suspected to be associated with TF.
TF	Terrorism financing can be defined as any support, in any form, to terrorists or to those who encourage, plan, or engage in terrorism. A terrorist group, like any other criminal organization, builds and maintains an infrastructure to develop sources of funds and channel them to those who provide materials and or services to the terrorist organization.
The Company	'NB PAY FZCO'
Virtual Asset or Virtual Currency	<p>According to AML/CFT Law, a digital value but not having any legal status as a currency or money, which is not guaranteed by a central bank or any other public authority and which is not necessarily connected to any currency but is recognized by natural and legal persons as a medium of exchange which can be transferred, secured and sold by electronic means.</p> <p>According to the FATF, any digital representation of value that can be digitally traded, transferred or used for payment. It does not include the digital representation of fiat currencies.</p>

## 2. Policy statement

The Company and its employees are committed to the highest standards of ML and TF prevention. We have effective risk assessment measures and controls in place to ensure compliance with current regulations, laws and standards and ensure a continuous practice of business relationship monitoring and staff training for an inclusive approach.

We understand that the ML regulations and legislation place a responsibility upon NB PAY FZCO employees and senior management to tackle ML across a broad spectrum, including financial transactions, payment processing, or in any way dealing with, or concealing, the proceeds of any predicate offense. We operate in a transparent environment with assessment, monitoring and reporting at the heart of our business functions. We are dedicated to the prevention of ML and TF and continue to improve existing measures through dedicated action plan.



### 3. Purpose

The purpose of this Policy is to ensure that NB PAY FZCO complies with the obligations and requirements set out by AML/CFT Law and other applicable legal acts of the UAE, regulations and rules regarding the prevention, identification and reporting of ML/TF. This includes ensuring that we have adequate systems and controls in place to mitigate against risks posed to the firm and its Customers, including the strict verification and KYC checks on Customers, transactions and third parties with whom we do business.

This Policy provides guidance and a systematic approach for our employees to ensure that their knowledge and understanding of the financial crime regulations is exemplary and sets out our expectations and their responsibilities under the regulations and our own objectives. We provide a broad, effective screening around the money laundering regulations and associated governing bodies and carry out testing and monitoring to assess and evidence employee understanding and application of the requirements.

NB PAY FZCO does everything possible to protect our employees and Customers from exposure of ML/TF threats and will always ensure a company-wide risk-based approach to the prevention of financial crime. We advocate continued compliance with the guidance and rules laid out in the following legislation:

- Law on the prevention of money laundering and terrorist financing of the UAE (Law 4/2002, Law 1/2004);
- The Criminal Code.

## 4. Document hierarchy

NB PAY FZCO has a range of risk and compliance documentation, with each document and type of document fulfilling a specific role.

### **Type: High-level policy documents**

Example: Policy on Prevention of Money Laundering and Terrorist Financing

Description: Policy documents give a high-level overview of Company's risk and compliance framework and may include key processes but do not go in to detailed processes and procedures or include specific or confidential information. Policy documents can be shared with third parties.

### **Type: Process documents**

Example: KYC Process and screening

Description: Process documents provide guidance to staff on how to carry out specific functions and activities. These documents may include sensitive and confidential details (such as screening rules or specifics of fraud controls) and are not suitable for general distribution to third parties.

### **Type: Supporting documents**

Example: Data request templates, Customer IDs

Description: Supporting documents include specific templates and work products from compliance processes. Any completed documents or templates (e.g., with Customer data in) would be confidential. Blank templates for completion by third parties are, by definition, suitable for sharing externally.

## 5. Scope

This Policy is mandatory and applies to all of NB PAY FZCO operations and activities. Adherence to the Policy is the responsibility of all NB PAY FZCO employees.

Failure of any employee to adhere to the guidance and objectives laid out in this Policy, may lead to disciplinary action.

## 6. Outsourcing arrangements

In relation to prevention of ML/TF, the Company outsources the following functions:

- LexisNexis – for KYC screening, whether the Customer/legal person (its beneficiaries and directors) is subject to international financial sanctions and other restrictive measures.

MLRO is responsible for the supervision of outsourcing arrangements and therefore is properly instructed how to use and benefit outsourcing arrangements.

## 7. AML/CFT related Roles and Responsibilities

### 7.1. CEO

CEO acts as MLRO and is responsible for:

- Approving the AML/CFT Policy and procedures;
- Having a global vision of the implemented measures and the AML/CFT risks associated to NB PAY FZCO activities;
- Making decision regarding NB PAY FZCO general strategy to manage AML/CFT risks;
- Ensuring that allocated NB PAY FZCO employees are knowledgeable;
- Evaluating the performance of the Compliance Function in regards to the AML/CFT activities.

### 7.2. CEO acting as the MLRO

The CEO is the first point of contact for issues, which are relevant to ML matters and, when it is necessary, takes measures to prevent ML and other organisational steps. His duties as the MLRO include in particular:

- Defining the necessary level of knowledge on existing and emerging regulatory compliance requirements across the firm;
- Decision as to whether there is a suspicious case which is subject to reporting requirements;
- Documentation of reported matters or suspicious persons in connection with ML and fraud;
- The issuing of instructions in suspicious cases;
- Decision as to whether a Customer relationship should be established or terminated in a case of doubt, whether a Customer block should be imposed, whether a transaction should be rejected in a case of doubt or under which conditions the Customer relationship should be continued. These decisions and conditions are to be documented accordingly;
- The stipulation of limits for amounts per risk class, above which the provision of additional evidence is required;
- Providing guidance, advice, and/or training and educational programs to improve Company's understanding of related laws and regulatory requirements;
- Coordinating efforts related to audits, reviews, and examinations;
- Developing compliance and AML/CFT policies and procedures;
- Applying KYC to the new Customers;
- 
- Once a year reviews the AML/CFT Policy and procedures.

Changed legal framework conditions are communicated to the employees at internal meetings, on training courses, in newsletters and information emails.

These internal meetings on the subject of compliance and money laundering are held annually or in conjunction with current events. The information emails must be sent out annually or on an ad hoc basis. This creates an internal control system that corresponds to the type and scope of the transactions carried out.

### 7.3. Employees

With regard to the prevention of ML, the following obligations apply to the employees:

- Identifying and reporting suspicious facts to the CEO;
- Supplying KYC measures to all NB PAY FZCO Customers;
- Participation in Compliance & AML/CFT Meetings (mandatory for all employees), collection and documentation of Customer information (depending on the type and scope of the business relationship);
- Timely execution/implementation of any special investigations requested by the CEO.

## 8. How NB PAY FZCO deals with ML/TF

Since some of the features of Money Service Business Institutions and their agents provide an attractive vehicle for criminal and legitimate funds to be used for the financing of terrorism, NB PAY FZCO makes sure to tailor its products to its specific Customer audience and to set limits in line with the knowledge about the Customer and its business/activities. NB PAY FZCO does not issue prepaid cards or provide services in any way to unanimous Customers or Customers whose identity has not been established and verified in strict abidance with internal rules and regulations.

NB PAY FZCO does not engage in business activities with:

- shell corporations and shell banks;
- high risk legal entities or individuals;
- unlicensed FIs;
- other FIs which provide services to unlicensed financial institutions;
- other FIs which provide services to shell corporations and shell banks;
- sanctioned entities appearing in the OFSI, EU, UN or OFAC sanction lists;

Shell company is perceived to be a corporate entity, which corresponds to at least one of the below mentioned criteria:

- no connection to the real business activity;
- company is registered in jurisdiction with lack of reporting obligations;
- company has no actual business address in the company where it is registered.

In line with AML/CFT Law and industry-wide best practices, NB PAY FZCO identifies its potential Customers and their UBOs, verifies their identities before starting of a business relationship.

Every single Customer is risk-ranked individually and in line with Risk-Based Approach.

NB PAY FZCO ME checks the database of its Customers against sanction and PEP lists, criminal sources.

NB PAY FZCO keeps track of Customer information for ongoing monitoring of business relationships using its internal software NB Pay. NB PAY FZCO limits its Customer base to corporate entities (small and mediums sized) and natural persons associated with these corporate entities. Full description of the Customer from the side of AML/CFT risks is available in Customer Risk Scoring Procedures.

Under no circumstances, business relationships can be formed or Transaction executed, if the Customer has failed to provide required information in relation to KYC process. In scenario where the acting Customer failed to provide required KYC information upon request of NB PAY FZCO employee based on reasons provided above, business relationships must be terminated as soon as feasible to

avoid material and reputational risk of the Company. NB PAY FZCO must not enter into business relationships with anonymous Customers.



## 9. NB PAY FZCO Customers

NB PAY FZCO aims to provide its services to business Customers as well as private individuals.

Typical NB PAY FZCO Customer is a small and medium enterprise using the services to make and receive payments, use bank accounts for business purposes and exchange currency.

At the point of onboarding, NB PAY FZCO collects all relevant information sufficient to perform KYC screening and check identities of all associated natural persons. Only verified and fully checked Customers are granted with access to financial functionality.

For required Customer information please refer to the KYC Procedure.

Onboarded Customers with full access to functionality within their profile type receive an initial cumulative, annual top-up limit which goes in line with NB PAY FZCO strategy of controlling the risks from the very beginning of a business relationship.

Active Customer may request an increase of his/her annual cumulative limits by providing additional information about him/herself along with documentary evidence, which is subsequently evaluated by the CEO (as the MLRO).

NB PAY FZCO denies access to its services to Customers, which reside or are established in 'prohibited' countries, as well as restricts certain transactions with:

- Countries which are identified by a credible source as lacking AML/CFT controls;
- Countries under sanctions or embargos issued by, for example OFSI, UN, EU or OFAC;
- Countries which have significant level of corruption, tax evasion, drug production or other relevant criminal activity;
- Countries which are identified by a credible source as providing funding or support to terrorism;
- High intensity drug-trafficking areas.

## 10. Politically exposed persons

NB PAY FZCO sees a Politically Exposed Person (PEP) as an individual who is or in the last 12 months has been entrusted with a prominent function and as such could potentially abuse such position or function for the purposes of laundering or other predicate offences, such as corruption or bribery.

NB PAY FZCO utilises existing commercial resources and other databases for the identification of PEPs conducting KYC.

NB PAY FZCO considers following persons as high risk customers.

NB PAY FZCO do not onboard high risk customers.

## 11. Sanctions screening

To be compliant with the Sanctions regime, NB PAY FZCO must ensure that its Customers, their representatives, counterparties, directors and / or UBOs are not included into sanctions lists. Detailed information related the lists, including PEPs, adverse media and corruption, is a subject to KYC screening.

NB PAY FZCO must ensure that the check against the sanctions lists will be executed in a timely manner as in most cases the economic sanctions and / or restrictive measures come into force immediately upon their publication.

Check against the list must be carried out before onboarding of new Customer, also as a part of continuous monitoring of the Customers' Business Relationship.

## 12. Geography

All countries have been risk-ranked and risk-rating methodology properly documented. The outputs of the ML/TF risk model are formally reviewed and endorsed by CEO. Country Risk Matrix is reviewed on the annual basis with approval of MLRO.

Geographical risk rating is based on information obtained from the reliable trustable sources. The list of the sources, including the links is present in Customer Risk Scoring Procedures.

Geographical risk has influence on control measures, transaction scrutiny, cumulative and transactional limits as well as other restrictions and controls applied to the Customer.

Before establishing a business relationship with a Customer from high-risk third country, NB PAY FZCO employees always ensure that MLRO approval for establishing the business relationship is obtained and recorded.

## 13. Risk-based approach

The objective of NB PAY FZCO as a company is to increase the liquidity for all financial assets, making markets more fair and more efficient for all participants.

Technologies such as crypto-assets create new opportunities for criminals and terrorists to launder their proceeds or finance their illicit activities. NB PAY FZCO is aware that the crypto-assets ecosystem has seen the rise of mixers and tumblers, decentralized platforms and exchanges, and other types of products and services that enable or allow for reduced transparency and increased obfuscation of financial flows. NB PAY FZCO is committed to understand the ML/TF risks associated with the emergence of crypto-assets and take appropriate mitigating measures to address them.

NB PAY FZCO conducts KYC for every new Customer and does not onboard high risk Customers.

### 13.1. High Risk Customers and Situations

Where an individual or a corporate entity classified as high-risk, the company does not work with these Customers in a high-risk category.

Some of the high-risk cases include:

- Politically Exposed Person's (PEP's);
- Relatives and/or close associates of PEPs;
- High-net Worth Individual/s;
- Customers with large and/or complex transactions;
- Unusual transactions or unusual patterns;
- Entities registered in Countries classified as High Risk by FATF;
- Unregistered Organisations;
- Corporate entities engaged in activities, closely associated with money laundering.

## 14. Other provisions

### 14.1. Records Management

NB PAY FZCO complies with provisions of the highest standards of AML/CFT programs.

NB PAY FZCO has the right to keep other registries indicated in the Policy or AML/CFT Law.

Registers are maintained in electronic format in NB Pay software. Data is entered into registers in chronological order on the basis of documents confirming a transaction or other legally valid documents. Data is entered without delay, but not later than within 3 business days after the date on which the transaction was carried out. Data entered in the registers must correspond to the data contained in the documents confirming the transaction of that Customer or in other legally valid documents related to the carrying out of the transaction.

The following information is kept in the NB Pay registers:

- Customer identification information (e.g. name, surname, personal code/DOB, address, citizenship for the Customer – natural person; name, legal form, registered office, actual business address, code (if any) for the Customer – legal person);
- data identifying the Customer's representative if transaction is carried out through a representative (name and surname, personal code/DOB);
- person, i.e. recipient of monetary funds (name, surname, personal code/DOB, address, citizenship for the Customer – natural person; name, legal form, registered office, actual business address, code (if any) for the Customer – legal person);
- transactions – date of transaction, description of assets subject to the transaction and its value.

Additional information:

- contracts, agreements, invoices, bills of lading, waybills, specifications, order forms;

Additional information is entered into the register of Customers with whom business relationship was terminated due to failure to provide requested information or due to other circumstance related to the breach of AML/CFT requirements:

- name, surname, personal code/DOB, citizenship of the UBO;
- grounds for termination of the business relationship.

Data recorded in NB PAY FZCO registers may not be disclosed publicly. The person in charge of keeping the registers of the Company is entitled to provide the data recorded in the registers solely to CEO, MLRO or public authority or body as indicated in applicable law.

The person in charge of keeping NB PAY FZCO registers is responsible for the protection of the data in the registers, risk analysis, maintenance, update and protection of the data processing systems, as well as, ensuring an uninterrupted functioning, provision of logical security measures, storage, arranging backup copies of registry data, their storage, protection and restoring, and, if necessary, archiving the registry data and proper implementation of the Policy.

The following AML/CFT law is followed by NB PAY FZCO related to the record keeping:

- data entered into the registers kept by NB PAY FZCO shall be retained for 1 year from the date of the transactions or termination of the business relationship with the Customer;
- information/data/documents (copies of documents) obtained from the Customer during establishment the identity of the Customer and UBOs shall be retained for 1 years following end of the transaction or termination of business relationship with the Customer. For the remote establishment of the identity, Customer's face and ID photos must be safe kept, along with IP address and date when such documents were created;
- correspondence with the Customer shall be retained for 1 year following end of the transaction or termination of business relationship with the Customer;
- documents supporting Transactions or other documents related to the transaction shall be retained for 1 years following end of the transaction or termination of business relationship with the Customer;
- retention terms indicated in this Policy may be extended for a maximum additional period of 1 years upon the instruction of the state authority;
- NB PAY FZCO internal systems and procedures must ensure that the data/information/documents (copies of the documents) obtained in the cases specified herein and data entered in the registers should be protected from unauthorized destruction, alteration or use

## 14.2. Updating

NB PAY FZCO keeps track of Customer information for ongoing monitoring of business relationships using NB Pay software. Some of the measures include, but are not limited to keeping track of identification document, power of attorney and other document expiry dates.

Upon approaching an ID document expiry date, Customer receives automated reminder to update his/her identification document. Equal approach to the corporate entities where a designated contact person receives a reminder about the fact, that some of the submitted company documents, such as power of attorney, will soon expire. Upon document expiry, compliance and Customer support staff are also notified.

If new documents have not been submitted before the date of expiry, NB PAY FZCO reserves the right to suspend Customer's account until new identification document will be received and verified by compliance staff.

### 14.3. Suspicious Activity/Transaction Reporting

AML/CFT Law requires NB PAY FZCO to identify and report suspicious activities or transactions. NB PAY FZCO relies on the employees to identify and the systems to detect potentially Suspicious Activities or Transactions. This includes where NB PAY FZCO employees suspect or have reasonable grounds to believe or suspect, that a person is engaged in, or is attempting, ML/TF. Also, the Company creates and perpetually updates a list of red flags that might help to identify potentially Suspicious Activities or Transactions. Once identified or detected, NB PAY FZCO is required to promptly investigate potentially Suspicious Activities or Transactions.

CEO (MLRO) is responsible for SAR/STR preparation and submission as soon as an incident or suspicion arises.

CEO (MLRO) ensures that the below minimums are met with regards to the information disclosed on any reports:

- Full details of persons and entities involved;
- Full details of the nature of their/ NB PAY FZCO involvement;
- The types of illicit activity involved;
- The dates of such activities;
- Whether the transactions have happened, are ongoing or are imminent;
- Where they took place;
- How they were undertaken;
- The approx. and/or exact amount/s of money/assets involved;
- What has given rise to the suspicion.

Using all the information available at the time, CEO (as the MLRO) makes an informed decision using sound judgement as to whether there are reasonable grounds for knowledge or suspicion of ML/TF and to enable him to prepare the report, where appropriate.

In addition to the SAR/STR preparation, NB PAY FZCO also uses proprietary SAR/STR form to ensure that all information is correctly recorded at the time of suspicion and to enable us to retain the record for analysis and pattern tracking.

All NB PAY FZCO employees are aware of their obligation to report any suspicious or suspected inconsistent activities to the CEO with immediate effect.



#### **14.4. Disciplinary Action**

Breach of this Policy will be treated as gross misconduct and be dealt with in accordance with Company's Code of Conduct.

#### **14.5. Recovery Action**

NB PAY FZCO will take appropriate action, including legal action if it is deemed necessary, to recover any losses arising from financial crime. This may include action against third parties involved in the financial crime or whose negligence action contributed to the crime.

## 15. Version History

<b>Version</b>	<b>Effective Date</b>	<b>Reason for change</b>	<b>Next review date</b>	<b>Change originator</b>
1.0	30/10/2022	Initial version	30/10/2023	General Manager
2.0	31/10/2023	Changes of processes within NB PAY FZCO	30/10/2024	MLRO
3.0	05/03/2024	Updated AML Outsourcing Arrangements	05/03/2025	General Manager
4.0	15/06/2024	Changes of processes within NB PAY FZCO, updated AML Arrangements	15.06.2025	General Manager