

NEROBLANKO TECH B.V.

Documents Verification Guidelines

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1. INTRODUCTION

These Guidelines are designed to assist the relevant employees and agents of the Company to verify the documents obtained during the CDD process and to recognize customers' attempts at supplying falsified, outdated or modified documents.

This Procedure forms an integral part of the Company's AML Compliance Program. It should be read in conjunction with the Company's AML, CFT and CFP Policy (the "AML Policy").

Terms not otherwise defined herein have the same meaning as in the AML Policy.

2. CUSTOMER IDENTITY

As a rule, the Company verifies the identity and age of a customer on the basis of an unexpired government-issued document containing photographic evidence, such as:

- Passport
- National ID card

The following documents are accepted as proof of address (the list is not exhaustive):

- A recent utility bill for a service installed and provided at a residential property (except mobile phone bills),
- A recent bank statement or reference letter from a financial institution,
- An official conduct certificate issued by an authority of the customer's current place of residence where the customer has resided for the past 6 months,
- A recent bill / statements / appointment confirmation from the state hospital,
- A lease agreement,
- Other government-issued documents.

Documents that are sent for verification purposes must be clear, legible and of good quality. Documents submitted as proof of address should be dated within the last 3 months showing the full document with all four corners visible.

Additionally, in order to verify the ownership of the payment methods the following may be requested:

- Bank documentation showing customer's complete IBAN and personal details,
- A colour photo of the card (both sides) with covered middle part of the card number and hidden CV2 number,
- A screenshot from the e-wallet account.

3. SOW AND SOF

The following is a list of SOW/SOF documents that the company considers, along with an analysis of the dates, nature and other details pertaining to the source:

Employment Income:

- Payslip,
- Employment Contract,
- Income Tax Records,
- Bank Statement highlighting salary and/or other income.

Investment Proceeds:

- Document showing the initial investment proceeds which had been legally obtained,
- Document showing the investor owned the investment and receipts showing the sale of the investment proceeds.

Sale of Property:

- Document showing the purchase contract of the property,
- Document showing the title of the property showing ownership tax receipts paid on the property.

Ownership in a company / Company Sale or Sale of an interest in company:

- Signed letter from solicitor / letter from regulated accountant of sale and sight of investment monies on bank statements,
- Copy of contract of sale and sight of investment monies on bank statements,
- Letter from the financial authorities showing ownership of companies or directorship of companies.

Gift / Inheritance:

- Grant of Probate (with a copy of the will) which must include the value of the estate/property or Solicitor's letter,
- Letter from donor confirming details of gift (amount, date given and reason) and acknowledging the source of the donated funds.

Compensation Payment:

- Letter or court order from compensating body or a solicitor's / Advocate's letter showing amount, date received and information as to where the source of these funds has been derived from.

Gaming Winnings:

- Letter from relevant organization on their letter-headed paper (lottery headquarters/betting shop/casino), stating the applicant's full name and residential address, date of win and amount won,

- Bank statements showing funds deposited by the named organization,
- Copies of any media coverage would help as supporting evidence.