



STATUTE & LEGAL FRAMEWORK

AUREON SOLUTIONS LIMITED

1. GENERAL COMPANY INFORMATION

Company Name:

AUREON SOLUTIONS LIMITED

Company Number:

16873073

Registered Office Address:

99 Woden Road West

Wednesbury, Walsall

England, WS10 7TB

Jurisdiction:

United Kingdom

Legal Form:

Private Limited Company (Ltd)

2. NATURE OF BUSINESS

AUREON SOLUTIONS LIMITED conducts its business activities in accordance with the applicable laws of the United Kingdom and relevant international regulations.

2.1 Consultancy Services

- Corporate and business consultancy services
- Receivables and claims management advisory
- Financial and operational optimisation consulting
- International business and commercial advisory services

2.2 Debt Recovery & Receivables Management

- Management and recovery of **commercial (B2B) receivables only**
- Administration of outstanding receivables on behalf of corporate clients
- Lawful negotiations with debtors in compliance with applicable regulations
- Support in pre-legal and administrative recovery processes



The Company does **not** engage in forced collection practices, does **not** use unlawful methods, and does **not** pursue private individuals acting in the capacity of consumers.

2.3 Banking and Financial Intermediation

- Intermediation in banking and payment-related processes
- Introduction and facilitation of relationships between clients and partner banks
- Administrative and operational support during banking procedures
- Facilitation of international payment and fund transfer processes

The Company does **not** provide banking services directly and does **not** hold a banking or payment institution licence.

3. REGULATORY STATUS

3.1 Financial Regulatory Position

AUREON SOLUTIONS LIMITED:

- Is **not** a bank
- Is **not** an Electronic Money Institution (EMI)
- Does **not** provide regulated payment services in its own name
- Does **not** hold or safeguard client funds

The Company operates exclusively as:

- A **Consultancy Provider**
- A **Commercial Intermediary**
- An **Introducer to regulated financial institutions**

All regulated financial and banking services are provided **solely by licensed partner banks**, including but not limited to international banking institutions.

4. LEGAL BASIS AND APPLICABLE REGULATIONS

The Company operates in compliance with the following legal and regulatory frameworks:

4.1 United Kingdom Legislation

- Companies Act 2006
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Bribery Act 2010
- Proceeds of Crime Act 2002 (as applicable in cooperation with banking partners)



4.2 European and International Standards

- ☐ EU General Data Protection Regulation (Regulation (EU) 2016/679)
- ☐ AML / CTF standards (applied through licensed partner banks)
- ☐ OECD Principles of Corporate Governance
- ☐ International Commercial Law standards applicable to B2B activities

5. AML, KYC AND COMPLIANCE

- ☐ The Company does **not** independently conduct AML or KYC procedures
- ☐ All AML and KYC processes are performed by **licensed partner banks**
- ☐ AUREON SOLUTIONS LIMITED may perform:
 - Initial commercial screening
 - Review of corporate and business documentation
 - Administrative preparation and support for banking onboarding processes

6. DATA PROTECTION

The Company undertakes to:

- ☐ Process personal data lawfully, fairly and transparently
- ☐ Use personal data solely for legitimate business purposes
- ☐ Not disclose personal data to third parties except where legally required or with the data subject's consent
- ☐ Implement appropriate technical and organisational measures to ensure data security and confidentiality

7. LIMITATION OF LIABILITY

AUREON SOLUTIONS LIMITED:

- ☐ Does not guarantee the approval or provision of banking services
- ☐ Does not make financial decisions on behalf of clients
- ☐ Bears no responsibility for decisions made by partner banks
- ☐ Is not liable for regulatory or compliance decisions taken by third parties

8. FINAL PROVISIONS

This document constitutes an internal statute and legal framework governing the operations of AUREON SOLUTIONS LIMITED and applies to all business activities of the Company.

This document has been prepared in accordance with the applicable laws of the United Kingdom and relevant international standards.



ADDENDUM

BANK-SPECIFIC COMPLIANCE STATEMENT

(For International Banking Partners – incl. JPMorgan Chase)

9. BANKING PARTNER RELATIONSHIP & SCOPE OF COOPERATION

AUREON SOLUTIONS LIMITED engages with licensed international banking institutions strictly within the scope of **commercial consultancy and intermediation services**.

The Company may cooperate with global banking groups, including but not limited to **international correspondent and clearing banks**, for the purpose of facilitating lawful commercial transactions on behalf of its corporate clients.

Such cooperation is based on the following principles:

- No regulated financial services are provided by AUREON SOLUTIONS LIMITED
- All regulated banking activities are conducted exclusively by the banking partner
- The Company acts solely as a **commercial introducer and operational facilitator**

10. CLIENT FUNDS & PAYMENT FLOWS

AUREON SOLUTIONS LIMITED hereby confirms that:

- The Company **does not receive, hold, control, safeguard, or process client funds**
- All monetary transactions are executed **directly through accounts held with licensed partner banks**
- The Company has **no signing authority** over client bank accounts
- The Company does **not operate pooled, escrow, or safeguarding accounts**

Any payment flows associated with client transactions are processed entirely within the banking infrastructure of the partner bank and remain under its exclusive regulatory oversight.

11. AML / KYC ALLOCATION OF RESPONSIBILITIES

The allocation of AML and KYC responsibilities is defined as follows:

Banking Partner (e.g. JPMorgan Chase)

- Full responsibility for AML, KYC, CDD and EDD procedures
- Client risk classification and ongoing monitoring
- Transaction monitoring and suspicious activity reporting
- Regulatory reporting to competent authorities



AUREON SOLUTIONS LIMITED

- Preliminary commercial onboarding support
- Collection of corporate documentation for administrative review
- Non-regulatory business screening (non-binding)
- Operational liaison between the client and the banking partner

AUREON SOLUTIONS LIMITED does **not** perform regulated AML or KYC determinations and does **not** substitute the bank's compliance function in any capacity.

12. SANCTIONS, PEP & RISK CONTROLS

The Company confirms that:

- It does not independently determine sanctions, PEP or high-risk classifications
- All sanctions screening and PEP determinations are performed by the banking partner
- The Company cooperates fully with banking partners in the provision of requested documentation or information
- No services are provided to clients in jurisdictions subject to comprehensive international sanctions, unless explicitly approved by the banking partner

13. DATA SHARING & CONFIDENTIALITY

Where required for banking onboarding or transaction facilitation:

- Client data may be shared with partner banks strictly on a **need-to-know basis**
- Data sharing occurs in compliance with:
 - UK GDPR
 - EU GDPR (where applicable)
 - Banking secrecy and confidentiality standards

AUREON SOLUTIONS LIMITED does not commercialise, sell, or misuse client or banking partner data.

14. GOVERNANCE & OPERATIONAL TRANSPARENCY

AUREON SOLUTIONS LIMITED maintains:

- Clear internal segregation between consultancy activities and banking partner processes
- Documented internal procedures for client onboarding support
- Transparent cooperation with banking compliance teams upon request

The Company commits to maintaining an open and cooperative relationship with its banking partners at all times.



15. BANK-SPECIFIC DISCLAIMER

This Addendum is provided for the purpose of banking compliance assessment and onboarding review.

Nothing in this document shall be construed as:

- A representation of regulated financial activity
- A delegation of compliance responsibility from the banking partner
- An agency or fiduciary relationship in respect of client funds

All final decisions regarding account opening, transaction execution, compliance approval, and ongoing monitoring remain solely with the licensed banking institution.