

Compliance & Regulatory Statement

GB Advisory Services Ltd.

GB Advisory Services Ltd. is committed to operating to high standards of corporate governance, regulatory transparency, and financial integrity. This statement outlines our business model, regulatory positioning, and compliance framework.

1. Corporate Status

GB Advisory Services Ltd. is a company incorporated in England & Wales and operates in accordance with UK corporate governance and statutory filing requirements.

The Company provides administrative, billing, reconciliation, and settlement coordination services to affiliated operating companies.

2. Regulatory Position

GB Advisory Services Ltd.:

- Is **not** a payment institution
- Is **not** authorised or regulated by the Financial Conduct Authority (FCA) to provide payment services
- Does **not** provide money transmission, deposit-taking, wallet services, or custodial services
- Does **not** operate as a bank or electronic money institution

The Company acts solely in an administrative and coordination capacity within its commercial structure.

3. Payment Processing Model

All customer payments are processed exclusively through independent, FCA-authorized third-party Payment Service Providers (PSPs), including Stripe.

Key principles of our payment model:

- Payment card and financial details are processed within the regulated PSP environment
- Customer funds are safeguarded by the relevant PSP in accordance with applicable payment services regulations
- GB Advisory Services Ltd. does not independently safeguard client funds
- Funds remain within the PSP environment pending settlement and any applicable dispute or chargeback period
- Following settlement, funds are transferred to the designated operating company in line with contractual arrangements

GB Advisory Services Ltd. does not beneficially own customer funds and does not treat gross payment receipts as company revenue.

4. Financial Controls & Governance

The Company maintains structured financial and operational controls, including:

- Clear separation between administrative services and payment processing
- Defined reconciliation and reporting procedures
- Segregation of duties within financial oversight
- Documented accounting policies in line with UK standards
- Maintenance of statutory records in accordance with HMRC requirements

Financial records are retained in line with applicable UK tax and accounting legislation.

5. AML & Due Diligence Standards

While not a regulated financial institution, GB Advisory Services Ltd. applies proportionate risk-based compliance practices, including:

- Know Your Business (KYB) and counterparty due diligence
- Sanctions screening where appropriate
- Ongoing monitoring of commercial relationships
- Internal governance oversight

These measures support transparency, risk management, and regulatory alignment.

6. Tax & Revenue Treatment

GB Advisory Services Ltd. operates as a service provider within its group structure.

- The Company recognises only its contracted service fees as revenue.
 - Customer payments processed via third-party PSPs are not recorded as company turnover where the Company acts in an administrative capacity.
 - Accounting treatment follows applicable UK accounting standards and HMRC guidance.
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7. Data Protection

The Company processes personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

For further details, please refer to our Privacy Policy.

8. Commitment to Transparency

GB Advisory Services Ltd. is committed to:

- Clear disclosure of its business model
- Maintaining professional and compliant operating standards
- Cooperating fully with financial institutions, regulators, and tax authorities where required
- Continuous review and improvement of internal compliance processes

For regulatory or compliance enquiries, please contact: enquiries@gbasl.co.uk

Approved by: The Directors of GB Advisory Services Ltd.