# Your regulator's requirements, mapped to your licence

For Example Pay (UA non-bank payment provider, synthetic) · prepared on 12.11.2026 · public sources only · regulator: National Bank of Ukraine (NBU)

**Example: a synthetic profile, not a real firm. It shows the format of the page.**

Every requirement below has its legal status, the date we read the source and a link to the official text. We show only what a regulator or the register published. We make no statement about your rules, your fraud levels or your position with the regulator.

## 1. Your licence and services, as the public register shows them

| | |
|---|---|
| Firm | Example Pay (UA non-bank payment provider, synthetic) |
| Licence (register wording) | Payment institution licence (example wording) |
| Licence type used for this map | Non-bank payment service provider (payment institution or e-money institution, NBU licence) |
| Services listed | Money transfers without opening an account, Acquiring of payment instruments |
| Register | NBU: banks and other institutions, read on 12.11.2026 |
| Note | Synthetic example. Open-banking providers also appear in the NBU open API (S4). |

## 2. Requirements that apply to a firm with your licence

34 requirements. "Draft" means the text is published for discussion and is not law.

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-01 | Review every rule regularly, at least monthly, by back-testing (§16(10), §65-66) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-02 | Metric 1: rules triggered vs operations actually stopped or cards blocked (§60(1)) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |
| UA-NBU-03 | Metric 2: share of prevented fraud value in all fraud value (UAH) (§60(2)) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |
| UA-NBU-04 | Set effectiveness thresholds in writing; low effectiveness triggers an immediate review (§62-64) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-05 | Review outcome: keep, adjust, or cancel the rule (§68-69) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |
| UA-NBU-06 | Rule lifecycle: data, hypothesis, rule, back-test, refine, finalise, written approval, go-live (§56) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |
| UA-NBU-07 | A risk marker on every operation: low (automatic), medium (may stop for confirmation), high (stop until confirmed) (§49-52) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-08 | Keep a list of users who need enhanced control, and use it (§31) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |
| UA-NBU-09 | Daily reconciliation of payment operations (§16, §18, §2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |
| UA-NBU-10 | AI/ML risk models may build behaviour profiles (§48) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-11 | The NBU will assess effectiveness: documents, rules and markers, interviews (§19) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft resolution "On some issues of payment service providers' control over payment operations" |
| UA-NBU-S01 | Many accounts or cards per user, far above peers (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-S02 | Concentration of one operation type (card-detail transfers, account transfers, odd purchase amounts) (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA-NBU-S03 | High frequency of one operation type, in or out (e.g. over 10 top-ups in under 60 minutes) (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-S04 | Low balances despite high volumes (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA-NBU-S05 | Frequent large loan issue and repayment (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-S06 | Money in, quickly out, minimal balance left (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA-NBU-S07 | Gambling (MCC 7995) winnings without deposits, plus card transfers (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-S08 | Regular transfers to a personal account that look like business activity (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA-NBU-S09 | New merchant: volume above MCC peers right after onboarding, then closes (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-S10 | Merchant account: inflows mirror outflows (transit) (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA-NBU-S11 | Payment purposes atypical for the merchant's MCC (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA–NBU–S12 | Frequent changes of contacts, device, apps, IMEI, OS, IP/MAC (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA–NBU–S13 | Same device fingerprint across unrelated users (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-S14 | Impossible geography between operations (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA-NBU-S15 | One payer to many payees, far above peers (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU-S16 | Many payers to one payee, far above peers (Annex 2) | **Draft** Draft of 17.07.2026, published for discussion; not adopted | 11.11.2026 | NBU draft of 17.07.2026, annex 2: signs of atypical user behaviour (to be considered, §53(3); a provider may skip one with a written, justified judgement, §54) |
| UA-NBU116-01 | Updated remote verification of natural persons using credit-bureau data (Resolution 116) | **In force** In force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027) | 11.11.2026 | NBU Resolution No. 116 of 07.10.2026 (financial-monitoring regulations for banks and non-bank institutions) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU116-02 | Reports to the State Financial Monitoring Service only through the e-cabinet; registers with continuous numbering (Resolution 116) | **In force** In force since 10.10.2026; 3 months to align internal procedures (about 10.01.2027) | 11.11.2026 | NBU Resolution No. 116 of 07.10.2026 (financial-monitoring regulations for banks and non-bank institutions) |
| UA-NBU51-01 | The acquirer passes more payee (merchant) data to the issuer (Resolution 51) | **In force** In force since 20.05.2026; 6 months to comply (about 20.11.2026) | 11.11.2026 | NBU Resolution No. 51 of 14.05.2026 (issuing and acquiring payment instruments) |
| UA-NBU51-02 | The acquirer shows its full name before an online payment; receipts show the payee, commission, payment purpose and MCC (Resolution 51) | **In force** In force since 20.05.2026; 6 months to comply (about 20.11.2026) | 11.11.2026 | NBU Resolution No. 51 of 14.05.2026 (issuing and acquiring payment instruments) |

| ID | REQUIREMENT, IN PLAIN WORDS | LEGAL STATUS | READ ON | OFFICIAL SOURCE |
|---|---|---|---|---|
| UA-NBU51-03 | Acquiring for natural persons only for defined categories, with set data passed to the issuer (Resolution 51) | **In force** In force since 20.05.2026; 6 months to comply (about 20.11.2026) | 11.11.2026 | NBU Resolution No. 51 of 14.05.2026 (issuing and acquiring payment instruments) |
| UA-NBU54-01 | No more non-application of sanctions to non-bank PSPs doing acquiring without authorisation (Resolution 54) | **In force** Grace period ended 02.09.2026 | 11.11.2026 | NBU Resolution No. 54 of 27.05.2026 |
| UA-16013-01 | Criminal liability for passing, receiving, buying or giving access to payment instruments or payment data so that others commit fraud (Criminal Code art. 200-1 (one outlet says 201-1)) | **Adopted by parliament, signature not confirmed** Adopted by the Rada 28.10.2026; presidential signature not confirmed | 11.11.2026 | Bill 16013 (drop accounts), new Criminal Code article |

## 3. Our rule or check for each requirement

"Available" means it is in our latest release (v0.7.0). "Development branch" means built and tested by us, not released yet. A checklist question is something we ask in a review, not a product feature.

**Released rule or check: 32** · **Development branch: 0** · **Checklist question: 2** · **Nothing yet: 0**

| ID | REQUIREMENT | OUR RULE OR CHECK | STATE |
|---|---|---|---|
| UA-NBU-01 | Review every rule regularly, at least monthly, by back-testing | • Rule review collector and report: Monthly per-rule replay and decay over months *(available)* | **Released rule or check** |
| UA-NBU-02 | Metric 1: rules triggered vs operations actually stopped or cards blocked | • Rule review collector and report: Hits vs stops per rule *(available)* | **Released rule or check** |
| UA-NBU-03 | Metric 2: share of prevented fraud value in all fraud value (UAH) | • Rule review collector and report: Prevented value / (prevented + lost), from your labels *(available)* | **Released rule or check** |
| UA-NBU-04 | Set effectiveness thresholds in writing; low effectiveness triggers an immediate review | • Rule review collector and report: Rules under your own threshold are flagged *(available)* | **Released rule or check** |
| UA-NBU-05 | Review outcome: keep, adjust, or cancel the rule | • Rule review collector and report: Keep / tune / retire per rule in the report *(available)* | **Released rule or check** |

| ID | REQUIREMENT | OUR RULE OR CHECK | STATE |
|---|---|---|---|
| UA-NBU-06 | Rule lifecycle: data, hypothesis, rule, back-test, refine, finalise, written approval, go-live | • A rule change goes live only after an operator's explicit approval, with a record *(available, released v0.7.0)*<br>• Question in our review checklist: How each step of the lifecycle is documented | **Released rule or check** |
| UA-NBU-07 | A risk marker on every operation: low (automatic), medium (may stop for confirmation), high (stop until confirmed) | • Engine: Score bands Allow / Review / Block map to the three levels [our judgement] | **Released rule or check** |
| UA-NBU-08 | Keep a list of users who need enhanced control, and use it | • Engine: Your own lists, read by the rules<br>• Question in our review checklist: Who maintains the list and how it reaches the rules | **Released rule or check** |
| UA-NBU-09 | Daily reconciliation of payment operations | • Data check in our product: Reconciles your exports by UTC day: payments vs rule-hit log, and a ledger export if you give one *(available, released v0.7.0)*<br>• Question in our review checklist: How daily reconciliation is done and recorded | **Released rule or check** |
| UA-NBU-10 | AI/ML risk models may build behaviour profiles | • Engine: Partly: statistical per-customer profiles (the customer's usual amount and usual hour), not a machine-learning model; the requirement allows profiles, it does not oblige them [our judgement; founder «так» 2026-11-14]<br>• `amount_far_above_customer_average` *available, released v0.7.0*<br>• `unusual_hour_for_customer` *available, released v0.7.0* | **Released rule or check** |

| ID | REQUIREMENT | OUR RULE OR CHECK | STATE |
|---|---|---|---|
| UA-NBU-11 | The NBU will assess effectiveness: documents, rules and markers, interviews | • Rule review collector and report: Review report usable as an evidence pack *(available)* | Released rule or check |
| UA-NBU-S01 | Many accounts or cards per user, far above peers | • Engine: Related signal, not the same sign<br>• `multi_account_device` *available, released v0.7.0*<br>• `multi_account_ip` *available, released v0.7.0* | Released rule or check |
| UA-NBU-S02 | Concentration of one operation type (card-detail transfers, account transfers, odd purchase amounts) | • `operation_type_concentration` *available, released v0.7.0* | Released rule or check |
| UA-NBU-S03 | High frequency of one operation type, in or out (e.g. over 10 top-ups in under 60 minutes) | • `inbound_sender_fan_in` *available, released v0.7.0*<br>• `high_customer_velocity_1h` *available, released v0.7.0* | Released rule or check |
| UA-NBU-S04 | Low balances despite high volumes | • `rapid_pass_through` *available, released v0.7.0* | Released rule or check |
| UA-NBU-S05 | Frequent large loan issue and repayment | • `loan_issue_repayment_churn` *available, released v0.7.0* | Released rule or check |

| ID | REQUIREMENT | OUR RULE OR CHECK | STATE |
|---|---|---|---|
| UA-NBU-S06 | Money in, quickly out, minimal balance left | • `rapid_pass_through` *available, released v0.7.0* | **Released rule or check** |
| UA-NBU-S07 | Gambling (MCC 7995) winnings without deposits, plus card transfers | • `gambling_winnings_without_deposits` *available, released v0.7.0* | **Released rule or check** |
| UA-NBU-S08 | Regular transfers to a personal account that look like business activity | • `personal_account_business_activity` *available, released v0.7.0* | **Released rule or check** |
| UA-NBU-S09 | New merchant: volume above MCC peers right after onboarding, then closes | • `low_history_merchant_spike` *available, released v0.7.0* | **Released rule or check** |
| UA-NBU-S10 | Merchant account: inflows mirror outflows (transit) | • Engine: Account-level use of the rule<br>• `rapid_pass_through` *available, released v0.7.0* | **Released rule or check** |
| UA-NBU-S11 | Payment purposes atypical for the merchant's MCC | • `payment_purpose_atypical_for_mcc` *available, released v0.7.0* | **Released rule or check** |
| UA-NBU-S12 | Frequent changes of contacts, device, apps, IMEI, OS, IP/MAC | • `contact_change_to_payout` *available, released v0.7.0*<br>• `session_multiple_ips` *available, released v0.7.0* | **Released rule or check** |

| ID | REQUIREMENT | OUR RULE OR CHECK | STATE |
|---|---|---|---|
| UA-NBU-S13 | Same device fingerprint across unrelated users | • `multi_account_device` *available, released v0.7.0* | Released rule or check |
| UA-NBU-S14 | Impossible geography between operations | • `impossible_travel` *available, released v0.7.0* | Released rule or check |
| UA-NBU-S15 | One payer to many payees, far above peers | • `amount_structuring_account` *available, released v0.7.0* | Released rule or check |
| UA-NBU-S16 | Many payers to one payee, far above peers | • `beneficiary_reuse` *available, released v0.7.0*<br>• `inbound_sender_fan_in` *available, released v0.7.0* | Released rule or check |
| UA-NBU116-01 | Updated remote verification of natural persons using credit-bureau data | • Question in our review checklist: Remote-verification procedure<br>• Engine: Context for remotely verified new accounts [our judgement]<br>• `new_account_high_value` *available, released v0.7.0*<br>• `new_account_rapid_withdrawal` *available, released v0.7.0* | Released rule or check |
| UA-NBU116-02 | Reports to the State Financial Monitoring Service only through the e-cabinet; registers with continuous numbering | • Question in our review checklist: Reporting process | Checklist question |

| ID | REQUIREMENT | OUR RULE OR CHECK | STATE |
|---|---|---|---|
| UA-NBU51-01 | The acquirer passes more payee (merchant) data to the issuer | • Rule review collector and report: Completeness of payee name and MCC fields in your data *(available)* | Released rule or check |
| UA-NBU51-02 | The acquirer shows its full name before an online payment; receipts show the payee, commission, payment purpose and MCC | • Data check in our product: Checks your export: share of acquiring payments with a valid MCC, payee name, payment purpose and commission (the data, not your payment page) *(available, released v0.7.0)*<br>• Question in our review checklist: Customer information on the payment page and receipt | Released rule or check |
| UA-NBU51-03 | Acquiring for natural persons only for defined categories, with set data passed to the issuer | • `acquiring_to_person_missing_data` *available, released v0.7.0*<br>• Question in our review checklist: Allowed categories and data passed | Released rule or check |
| UA-NBU54-01 | No more non-application of sanctions to non-bank PSPs doing acquiring without authorisation | • Question in our review checklist: Authorisation status for acquiring | Checklist question |

| ID | REQUIREMENT | OUR RULE OR CHECK | STATE |
|---|---|---|---|
| UA-16013-01 | Criminal liability for passing, receiving, buying or giving access to payment instruments or payment data so that others commit fraud | • Engine: Receiving-side mule signals<br>• `rapid_pass_through` *available, released v0.7.0*<br>• `inbound_sender_fan_in` *available, released v0.7.0*<br>• `new_account_large_incoming_credit` *available, released v0.7.0*<br>• Question in our review checklist: How the firm would use an NBU register of persons needing enhanced control | **Released rule or check** |

## 4. Changed in the last 90 days

From our regulatory watch of official sources (data of 12.11.2026). Title, date and link only.

| DATE | REGULATOR | TITLE |
|---|---|---|
| 06.11.2026 | NBU | Національний банк у жовтні 2026 року застосував до двох банків і трьох … |
| 29.10.2026 | NBU | Пропонується внести зміни до порядку регулювання обігу електронних грошей для приведення їх … |
| 26.10.2026 | NBU | Пропонується оновити порядок планування та проведення виїзного моніторингу об’єктів оверсайта платіжної інфраструктури … |
| 20.10.2026 | NBU | Національний банк розпочинає комплексну роботу над спрощенням умов виходу на платіжний ринок |
| 11.10.2026 | NBU | Про затвердження Змін до Положення про здійснення Національним банком України безвиїзного нагляду … |
| 08.10.2026 | NBU | Вимоги щодо суміщення ключових функцій на платіжному ринку буде уточнено (доповнено) |
| 07.10.2026 | NBU | Про затвердження Змін до деяких нормативноправових актів Національного банку України з питань … |
| 01.10.2026 | NBU | Розпочинається обговорення змін до порядку емісії та еквайрингу платіжних інструментів (доповнено) |

| DATE | REGULATOR | TITLE |
|---|---|---|
| 28.09.2026 | NBU | Про внесення змін до Інструкції про порядок організації касової роботи банками та … |

## 5. One question for you

**Which of these do your rules cover today, and how do you check it?**

**What did we get wrong?**

If your current tools already cover a requirement, we will mark it so.