



To:

All Agents

Auckland, 2 July 2026

Subject: Circular — Agent Manual and Policy Updates

Dear Agents,

The Program Office is committed to keeping all stakeholders informed about updates and developments regarding the Nauru Economic and Climate Resilience Citizenship Program, in accordance with the Nauru Economic and Climate Resilience Citizenship Act 2024 (the “Act”) and its associated Regulations (as amended) under the Laws of the Republic of Nauru.

Following a review of existing Program Office policies, the Agent Manual has been updated. The revised version is attached for your reference and use. The purpose of this update is to clarify existing requirements, improve guidance for application preparation, and ensure consistency in the submission of applications and supporting documentation. Details of the amendments are set out in this circular for your reference.

1. Changes to economic ties requirements for applicants from Afghanistan, Sudan, Yemen, Russia, and Belarus
 - a) The policy has been revised to broaden the scope of permissible economic ties for applicants from Afghanistan, Sudan, Yemen, Russia, and Belarus, provided that such ties are limited to these countries.
 - b) Economic ties may include, but is not limited to, bank accounts, investment holdings, real estate ownership, rental income, business interests, employment income, pensions, or any other source of income generated from or connected to these countries.

For any applicant that maintains economic ties to one or more of the countries listed above, it is recommended that you consult with the Program Office before the application is submitted. Significant or ongoing economic ties may be deemed ineligible to apply.

2. Application Document Checklist

The following two documents have been removed and are no longer required to be submitted as part of an application package:

- a) Key Data Form
- b) Agent Due Diligence Report on Applicants

Licensed agents remain responsible for conducting due diligence on prospective applicants prior to onboarding to ensure they meet the Program's eligibility requirements, as per the Agent Licence Agreement.

Agents are also expected to carefully review the application document checklist and ensure that all required supporting documentation is complete, accurate, and submitted together with the application.

3. Clarification on De-Facto Partnership Requirements

- a) Where a de-facto partner is included in an application, the relationship must have existed for more than two years prior to submission. Previously the relationship period was not defined in the Agent Manual.
- b) The existence of the relationship must be substantiated through supporting documentation, which may include, but is not limited to joint bank account statements, joint lease or property ownership documents, official correspondence addressed to both individuals at the same address, children's birth certificates listing both partners as parents etc.

4. Additional Banking Details

- a) We have added a new banking relationship with the National Bank of Bahrain BSC, Bahrain, which will serve as an alternative banking option for program payments.
- b) Agents and applicants must ensure that these payments are remitted to the bank account specified on the relevant invoice. Failure to follow the payment instructions provided on the invoice may result in delays in processing or the rejection of the funds transfer.

5. Streamlined Source of Funds and Wealth Documentation Requirements

- a) A recent bank statement (issued within the last 3 months) must be provided to verify the ownership of the account and the availability of the funds disclosed under the banking details section of Form 1. Previously, 3 months of bank statements were required.
- b) Expanded options for applicants to evidence their employment income, including the acceptance of employment contracts, tax returns, and personal income tax certificates as supporting evidence.
- c) Amended guidance for self-employed applicants, including streamlined company documentation requirements and updated guidance on supporting documents to evidence source of income.
- d) Guidance has been updated for applicants with multiple shareholdings or ownership interests. An affidavit can now be provided in lieu of providing company documents (in most circumstances) for shareholdings and ownership interests that do not contribute materially to an applicant's wealth or annual income.
- e) Additional guidance has been included on acceptable supporting documentation for retired, unemployed, or non-salaried applicants. This includes evidence relating to pensions, investments, property holdings, trusts, inheritances, and other sources of wealth.

These changes are intended to streamline the application requirements without compromising on the due diligence that is conducted on the applicant(s), ensure the assessment of source of funds and source of wealth follows a risk-based approach, improve consistency across applications, and reduce the likelihood of additional information requests during application processing.

Should you have any questions or require further clarification, please contact the Nauru Program Office at agent.licence@nr.prgoff.com

Yours sincerely,

A handwritten signature in black ink, appearing to be 'EDC', written over a horizontal line.

Edward Clark
CEO, Nauru Program Office