

AML/KYC/KYB Policy

Version: 1.0 Draft. Effective date: [insert date].

Important legal note: this document is a drafting template prepared from business instructions. It must be reviewed by counsel admitted in the Sultanate of Oman before publication, especially for virtual asset, escrow, consumer, AML/CFT, arbitration and personal data requirements.

3. AML/KYC/KYB Policy

3.1. Checks

KYC/KYB is mandatory for each transaction of 100 USDC or more and for any withdrawal of funds from the Platform.

DevBay may conduct KYC/KYB, AML/CFT, sanctions, wallet-screening, fraud and source-of-funds checks at any time, regardless of transaction amount.

DevBay may request passport, ID, proof of address, corporate documents, UBO information, source of funds, source of wealth, wallet ownership proof and other information.

3.2. Countries and sanctions

DevBay does not set a fixed pre-defined list of prohibited countries and aims to serve Users from any country unless this conflicts with applicable law, sanctions, AML/CFT, provider requirements or internal risk assessment.

DevBay may deny service, freeze funds or an account, request documents or block a transaction in case of sanctions, AML, fraud, terrorist financing, darknet, ransomware, mixer, stolen funds or other risk.

3.3. Freezing and reporting

DevBay may hold funds until review is completed and is not required to pay out, refund or transfer funds until satisfactory documents are received and compliance procedures

are completed.

DevBay may share KYC/KYB, transaction and suspicious activity information with providers, banks, wallet-screening services, law enforcement, arbitrators and regulators.

The User is solely responsible for taxes, reporting, permissions, licenses and legality of using USDC in their jurisdiction.