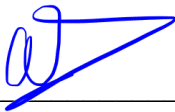


Know Your Client Policy

PB-AML-031-01

Signed by:

eMagnus Curacao B.V., Managing Director

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Date: 9/2/2025

A handwritten signature in blue ink, consisting of a stylized 'M'.

Epicstar B.V. (the “Company”), registered in Curacao adheres to and implements the “Know Your Customer” principles. These principles are designed to promote a secure environment by preventing financial crime and money laundering through thorough client identification and due diligence measures.

The Company reserves the right, at any time, to ask for any KYC documentation it deems necessary to determine the identity and location of a user in www.epicstar.com (the “Website”). The Company reserves the right to restrict the service, payment, or withdrawal until identity is sufficiently determined, or for any other reason in our sole discretion based on the legal framework.

The Company follows a risk-based approach to ensure compliance with anti-money laundering regulations and maintain a secure environment for all clients. Due diligence checks are conducted with care and attention to detail, and ongoing monitoring is implemented to support safe and transparent operations. Depending on the level of risk, transaction type, and customer profile, the Company applies three levels of due diligence:

SDD - simplified due diligence is used in instances of extremely low-risk transactions that do not meet the required thresholds

CDD - customer due diligence is the standard for due diligence checks, used in most cases for verification and identification

EDD - Enhanced Due Diligence is used for high-risk customers, large transactions or special cases.

When the Client registers an account with the Website Company collects its personal details to ensure a secure and personalized experience. This information is used to verify client's identity, provide customer support, and comply with legal obligations.

Separately and in addition to the above, for any withdrawal requests of any amount on the Website, or for any transactions that are attempted, completed, or deemed suspicious, The Company reserves a right to request the user to complete the full KYC process through the following steps:

- 1) Proof of Identity: Customers must provide a valid government-issued photo identification document (passport, driver's license, national ID card).
 - 2) Proof of Address: Customers must provide a recent utility bill, bank statement, or other official documents not older than 3 months, showing their name and residential address.
 - 3) Additional Verification: The Company may request additional documentation or information as deemed necessary, including but not limited to proof of income or source of funds.
- All documents provided by users must be in color, high resolution, and have legible text. Documents are accepted only in official languages supported by the platform.

Enhanced Due Diligence (EDD)

For users deemed to pose a higher risk, The Company will conduct Enhanced Due Diligence (EDD), which includes but is not limited to:

- Obtaining additional identification documents.
- Verifying the source of funds and wealth.
- Ongoing monitoring of transactions and account activity.

Notes on the “KYC Process”

- 1) When the KYC process is unsuccessful then the reason is documented and a support ticket is created in the system. The ticket number along with an explanation is communicated back to the user.
- 2) Once all proper documents are in our possession then the account gets approved.
- 3) The Company requires KYC data updates for active users at least once every two years, and annually for high-risk users.

Ongoing Monitoring

The Company will continuously monitor customers' accounts and transactions for suspicious activity. This includes:

- Regularly reviewing account activity for unusual patterns or behavior.
- Reassessing the risk profile of customers periodically.
- Conducting periodic review of customer information and documentation.

The company uses automated systems to analyze transactions for compliance with the client profile, abnormal activity and identify suspicious transactions.

Reporting Suspicious Activity

The Company will report any suspicious activity to the relevant authorities in accordance with applicable laws and regulations. This includes:

- Filing Suspicious Activity Reports (SARs) when unusual or suspicious behavior is detected.
- Cooperating with law enforcement and regulatory bodies in investigations.

Data Protection

The Company is committed to protecting the privacy and personal data of its users. All users' information will be handled in accordance with relevant data protection laws and regulations. The Company will implement robust security measures to protect users data from unauthorized access, disclosure, or misuse. According to the Anjouan regulations, customer data is stored in encrypted form for 5 years from the end of the business relationship.

Review and Updates

This KYC policy will be reviewed periodically and updated as necessary to ensure compliance with regulatory changes and industry best practices.

By implementing this KYC policy, The Company aims to maintain the highest standards of integrity and security in its operations, fostering a safe and trustworthy environment for its users.