

BlockBee AML (Anti-Money Laundering) Policy

Effective Date: September 7, 2026

This AML Policy (the “**Policy**”) sets out the AML arrangements of **Blockbee Inc.** (hereinafter, “**us,**” “**we,**” or “**BlockBee**”), a company registered under the laws of the Republic of Panama, with its registered office at Vía España 1280, Edificio Orión, Suite 7D, Panama City, Republic of Panama.

At BlockBee, we are committed to upholding integrity and transparency in all our operations to prevent and combat any form of money laundering, terrorist financing, and other financial crimes in compliance with the applicable regulatory obligations.

This Policy applies to all employees of the Company, officers, contractors, and consultants.

Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF)

BlockBee is committed to maintaining compliance with the applicable laws and regulations related to the prevention of economic crime. As such, BlockBee maintains an AML and CTF framework designed to prevent the misuse of its services for money laundering or terrorist financing activities.

Commitment to AML Compliance

BlockBee is dedicated to ensuring that our platform is not used to facilitate illegal activities. Our AML program is designed to detect, deter, and report suspicious activities in compliance with the applicable local regulations. Our commitment includes:

- **Know Your Customer (KYC) Procedures:** We have implemented a risk-based and tailored approach in our system. Accordingly, the level of control increases in line with the monthly transaction volume of our customers and their risk profile.
- **Transaction Monitoring:** We monitor transactions processed through our platform using Know Your Transaction (KYT) and other risk-screening tools designed to identify unusual, potentially suspicious, or otherwise high-risk activity. These systems automatically screen transactions against applicable risk indicators and generate alerts where potential concerns are identified. Such alerts are subject to further review and, where appropriate, enhanced investigation. Based on the outcome of our assessment, we may take appropriate risk-mitigation measures, including suspending or delaying the processing or forwarding of a

transaction, restricting certain services, rejecting a transaction, or taking any other action required by applicable law, regulation, sanctions obligations, or a competent authority.

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- **Risk Assessment:** We regularly conduct risk assessments to evaluate the effectiveness of our AML measures. This includes reviewing and updating our policies and procedures to address emerging threats and vulnerabilities.
- **Reporting Suspicious Activities:** In accordance with applicable laws and regulations, we communicate relevant information to the appropriate authorities when requested and respond to inquiries within a reasonable timeframe, adhering to the applicable duties, obligations, and legal restrictions in compliance with all applicable laws and regulations.

BlockBee has a zero-tolerance policy for any attempts to misuse our services for illegal activities, including money laundering, terrorist financing, and financial crimes. Therefore, we will collaborate with any authorities and work closely with regulatory bodies and law enforcement agencies to prevent and mitigate the risks associated with these activities. Any attempt to use our platform for illicit purposes will result in immediate and decisive measures, including account suspension, reporting to authorities, and legal action as necessary.

By adhering to these principles, we strive to create a secure and transparent environment for all our customers while contributing to the broader effort to combat financial crimes. We also encourage our users to uphold these standards and report any suspicious activities they may encounter to their respective authorities.

Anti-Bribery and Corruption

BlockBee prohibits all forms of bribery and corruption to ensure that:

- **No Bribery:** Employees and associated persons must not offer, give, solicit, or accept any form of bribe.
- **Gifts and Hospitality:** Any gifts or hospitality must be modest, reasonable, and transparent, ensuring they do not influence business decisions or compromise the integrity of the company or any of its personnel.

Data Retention

The Company is required to retain documents and information used for the identification and verification of clients for a minimum of five years following the termination of the business relationship.

To ensure compliance with these requirements, the Company has implemented appropriate measures for the protection of personal data.

Personal data collected under these rules may only be processed for the purpose of preventing money laundering and terrorist financing.

Changes BlockBee AML Policy

We may update this AML Policy whenever necessary. We encourage you to review this policy periodically to stay informed of any changes. If we make significant changes, we will notify you through our website or by other appropriate means.

How to Contact Us

If you have any questions about our company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us at legal@blockbee.io. We are here to address your privacy-related concerns and assist you with any inquiries.