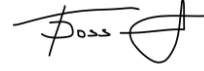


Intebix Ltd.  
Approved by



Director  
«19» March 2025

## **Admission to Trading Rules**

<b>Definitions and Abbreviations</b>	
<b>AFSA</b>	Astana Financial Services Authority
<b>AIFC</b>	Astana International Financial Centre
<b>Authorised Market Institution</b>	is a Centre Participant which has been licensed by the AFSA to carry on one or more Market Activities. An Authorised Market Institution can be an Authorised Investment Exchange, an Authorised Digital Asset Trading Facility, an Authorised Clearing House and/or an Authorised Crowdfunding Platform.
<b>AMI</b>	the Authorised Market Institution Rules
<b>AML</b>	Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Rules
<b>Authorised Firm</b>	a Centre Participant, which has been licensed by the AFSA to carry on one or more Regulated Activities.
<b>Authorised Person</b>	either an Authorised Firm or an Authorised Market Institution
<b>Authorised Private Digital Asset Trading Facility</b>	a Centre Participant, which has been licensed by the AFSA to carry on the Market Activity of Operating a Digital Asset Trading Facility.
<b>Centre Participant</b>	as defined in Article 1(5) of the Constitutional Law: “legal entities incorporated pursuant to the acting law of the Centre, and other legal entities accredited by the Centre”
<b>Client</b>	a Person, to whom a Centre Participant provides, intends to provide or has provided a service in the course of carrying on a Regulated Activity, Market Activity or Ancillary Service.
<b>COB</b>	the Conduct of Business Rules.
<b>Cold Digital wallet</b>	a Digital wallet that is stored in a platform (device) that is not connected to the Internet.
<b>Company</b>	INTEBIX Ltd.
<b>CRM</b>	customer relationship management
<b>Digital Asset (or Private Electronic Currency or Private E-money)</b>	a digital representation of value that (1) can be digitally traded and functions as (a) a medium of exchange; or (b) a unit of account; or (c) a store of value; (2) can be exchanged back-and-forth for Fiat Currency, but is neither issued nor guaranteed by the government of any jurisdiction, and (3) fulfils the above functions only by agreement within the community of users of the Digital Asset; and accordingly (4) is to be distinguished from Fiat Currency and E-money.

<b>Digital wallet (or E-wallet)</b>	a means (software application, electronic device or other mechanism/medium) for holding, storing and transferring Digital Asset, E-money and/or other assets, investments
<b>E-currency (or E-money)</b>	a digital representation of Fiat Currency used to electronically transfer value denominated in Fiat Currency.
<b>Financial Service</b>	a Regulated Activity or a Market Activity.
<b>GEN</b>	the General Rules.
<b>MAR</b>	the AIFC Market Rules.
<b>Market Activity</b>	an activity referred to in specified of Schedule 4 of AIFC General Rules, subject to any rules made by the AFSA adding to, removing, or otherwise modifying the specified activity.
<b>Operating a Digital Asset Trading Facility</b>	means operating a facility which functions regularly and brings together multiple parties (whether as principal or agent) with a view to the entering into of contracts: (a) to buy, sell or exchange Digital Assets for a Fiat currency; and/or (b) to exchange one Digital Asset for another Digital Asset, in its Facility, in accordance with its non-discretionary rules.

## Approval and Publication of Digital Assets

### Approval of the Digital Assets

The Digital Assets for submission for the approval, as well as the timescale applicable for approval must be in accordance AIFC MAR Rules and other Rules of AIFC. The documents and information related Digital Assets must be submitted to the company.

If the Digital Assets comprise multiple documents, the application for approval must be made using the appropriate form in relation to one or more of those separate documents.

The Company must submit Digital Assets documents to the AFSA for Approval.

The Company will only approve a Digital Assets, which has been filed in accordance with AIFC rules, and satisfy with following:

- (a) the Digital Assets meets all the applicable requirements in the AIFC Rules and AFSA Rules;
- (b) the Digital Assets is proved by the company to AFSA for listing;
- (c) the board of Directors (or another body competent to decide on such matters under an Applicant's constitutive documents and/or applicable law) of the applicant, whose Digital Assets are to be offered, has approved the Digital Assets offering.

If the Company is not approved Digital Assets, the company shall notice the Applicant about decision of the company. The relevant AIFC Law shall apply to a decision by the company not to approve.

If the company decides to exercise its power not to approve the Digital Assets, or to impose conditions or restrictions upon the approval of the Digital Assets, the Applicant may refer the matter to the Listing Committee for review and thereafter to the AIFC Court.

### Publication of Digital Assets

After the Digital Assets has been approved by the company, the Digital Assets must be made available to the public as soon as is reasonably practicable, and in any case, at a reasonable time in advance of, and at the latest at the beginning of, the Digital Assets and/or trading on the company's platform, whichever is earlier.

An approved Digital Assets is deemed to be made available to the public when such Digital Assets is public when such Digital Assets is published in an electronic form on the website of any one or more of:

- an Applicant; and/or
- the company.

The content and format of the Digital Assets made available to the public must at all times be identical to the version approved by the company and AFSA.

A copy of the White Paper must be delivered to any potential investors, upon request and free of charge, by the Applicant making Digital Assets.

### Duration of the validity of a White Paper

An approved White Paper are current only for a period of twelve months from the date on which that White Paper has been approved by the company and AFSA.

A financial intermediary may make an Digital Assets in reliance on approved White Paper which has been produced by the Applicant only in circumstances where:

- (a) the White Paper is a current White Paper and meets all the relevant requirements relating to White Paper;
- (b) the financial intermediary has undertaken such due diligence and care as is reasonable for such Applicant to undertake the purpose of ensuring that the White Paper meets requirements in above; and
- (c) the Applicant has given its prior written consent for the use of the White Paper by financial intermediary and the consent has been filed with company and has not been withdrawn.

Both the financial intermediary and the issuer of Digital Assets incur civil liability pursuant to the AIFC Law for White Paper.

A financial intermediary should undertake a review of the White Paper to ensure that the White Paper does not contain any obvious misleading or deceptive information or omissions that would be reasonably apparent to a financial intermediary assessing and analysing the White Paper.

#### Offer Document from other Jurisdictions

The company may approve an offer document produced under legislation in a jurisdiction other than AIFC for the purpose of meeting the requirements set out in the AIFC MAR Rules where the requirements of AIFC MAR Rule 1.7.4(b) are satisfied.

The company may approve an offer documents referred in accordance with requirements and procedures set out in the Policy and, subject conditions or restrictions imposed by the company and AFSA.

An application for approval of an offer documents produced in accordance with the legislation in a jurisdiction other than the AIFC must:

- (a) be made using the appropriate form;
  - (b) be accompanied by the relevant fee (if applicable); and
- include:
- (i) where the offer document is not in the English language, and English translation acceptable to the company and AFSA; and
  - (ii) a clear statement that it is an offer document prepared in accordance with the requirements applicable in the relevant jurisdiction and not in the AIFC or with the company.

An offer document is an approved White Paper where it has been approved by the company and AFSA with the requirements in the relevant AIFC Rules.

The right of referral to the company's Listing Committee and to the AIFC Court applies to decisions of the company under this policy.

The requirements referred are that:

- (a) the White Paper is produced under legislation in a jurisdiction other than the AIFC, comprising the rules and practices of an Equivalent Regulated Exchange and the law and practice of the country or territory in which the Equivalent Regulated Exchange is situated;

(b) the White Paper contains information equivalent to that which is required for a White Paper in the AIFC Framework Regulations and AIFC MAR rule; and

(c) the offer or meets all the other requirements relating to a White Paper as prescribed in the AIFC Regulatory Requirements and AIFC MAR Rules.

#### Notification of Material Changes during Circulation of the White Paper

In the case of a White Paper Offer, if an Applicant is required to produce Supplementary White Paper, that Applicant must:

ensure, that the Supplementary White Paper makes clear statement that it is Supplementary White Paper;

comply with the requirements relating to approval of a Supplementary White Paper;

ensure that the Supplementary White Paper is available until the end of the Offer Period:

in the same media and through the same channels as the original White Paper; and

to each offeree free of charge; and

provide the Supplementary White Paper without undue delay to each Person who has subscribed for or offered to purchase the Securities in reliance on the initial White Paper;

If the White Paper comprises a Registration Document and a Securities Note, the Supplementary White Paper must consist of an updated Registration Document and Securities Note.

Where Supplementary White Paper is published, the White Paper must be supplemented, where necessary, to take into account the new information included in the Supplementary White Paper.

When Supplementary White Paper has been filed, the Applicant responsible for producing the Supplementary White Paper must:

inform offerees via a prominent notice of their right to confirm or withdraw any subscription or offer made on the basis of the original White Paper where the Digital Assets had not yet been delivered to the investors at the time when the significant new factor, material mistake or material inaccuracy arose or was noted, and the manner in which to do so (including who investors may contact should they wish to exercise their right of withdrawal); and

allow the offeree a period of a least seven (7) Business Days from the date of receipt of the Supplementary White Paper in which to confirm or withdraw its subscription or offer.

#### Classification of Clients

The company in the trading platform will classify the clients as Individual and Corporate. Based on the classification the company will impose some levels of verification of the clients.

Clients will only be able to conduct any transaction (deposit, withdrawal or trading) on the company's platform by successfully completing the company's CDD or onboarding process. The company has four steps of user verification and the permitted activities differs by each verification level:

STEP 1 (Account Creation) – User sign up with verified email and password, but cannot do any transaction (i.e. no deposit, withdrawal and trading);

STEP 2 (Onboarding CDD) – User's legal name, DOB, national ID or passport number, nationality, gender, country of birth, residential address, a photo of national ID, a self-portrait photo or “selfie” of User & national ID, verified mobile phone number collected and checked identity against data source (Dow Jones, Sum&Sub).

STEP 3 (Additional CDD – Residential Address) – User's residential address proof (bank statement, phone or utility bill, etc.) issued within the last 1 or 3 months;

STEP 4 (Additional CDD – Bank Account) – User's to submit bank statement (within last 3 months) with bank name, account number, SWIFT/BIC code, beneficiary's name (should be the same as the User's legal name). Upon approval, the user can deposit and withdraw fiat currency.

After the 4 STEPS of verification, the company will classify the clients as Retail and Professional Clients. Based on the classification the company might place some limitation to Retail and Professional Clients.

Boundary conditions:

(a) the maximum size of funds up to which the Client Money Accounts are permitted to be deposited and/or refilled:

(i) for Retail Clients – natural persons: 0.5 (point five) BTC or equivalent amount in another Digital Asset;

(ii) for Retail Clients – Body Corporates: 5 (five) BTC or equivalent amount in another Digital Asset;

(iii) or Professional Client – within aggregated limits.

(b) the maximum size of funds for per Retail Client is up to which the Client may purchase Digital Assets:

Per month:

Maximum 1000 (one thousand) US Dollars.

Per year (the lesser of):

10% (percent) of annual income; or

5% (percent) of net worth of net worth of such the client (excluding the value of the primary residence)<sup>1</sup>; and

100.000 USD

For custody service of the company, the maximum size of aggregated funds of the Clients that a FinTech Lab Participant is permitted to hold without ensuring compensation arrangement (which can be, for example, in the form of performance assurance or guarantee) at any given instance for the purpose of Testing the FinTech Activities is:

for Retail Clients – 50 (fifty) BTC or equivalent Digital Asset;

for Professional Clients – 1,250 (one thousand and two hundred fifty) BTC or equivalent Digital Asset.

The AFSA can modify the above-mentioned limitation and impose further Limitation as appropriate and in accordance with section 32, 98(a) of FSFR, section FINTECH.

The company's Onboarding Team will review the perspective clients' documents and information. Based on the review the Onboarding Team will classify the clients as Professional and Retail Clients.

The Onboarding Team in regular way will provide the clients' information, documents and Onboarding Team's decision to Compliance Officer. Quarterly the Compliance Officer will report to Audit Committee about client classification procedures and decision that made by Onboarding Team and Compliance Officer.

The company impose limitation to Retail Clients that using the company service in respect to investing on Digital Assets. The company's will not allow to invest for Retail Clients in respect to Digital Assets in aggregate calculated over period of one month, an amount which exceeds the greater of (annual limitation):

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<sup>1</sup> to verify the income of net worth of the Retail Clients the company could rely on the Retail Clients' self-certification (for example, questionnaire where the clients self-report their income and net worth)

USD 1,000; or

The lesser of (i) 10 percent of the annual income; or (ii) 5 percent of the net worth of such Retail Client (excluding the value of the primary residence), up to a maximum aggregate amount of USD 100,000.

The Company will allow to Retail Client invest up to USD 1,000 without proof of income or net worth. If the Retail Client intends to invest more than USD 1,000, the Retail Client must provide proof documents and invest up to 10 percent of the annual income or 5 percent of the net worth (but not more than USD 100,000), whichever is less.

The proposal does not envisage limits for Professional Clients and Market Counterparties.