



Madora LLC

Anti-Money Laundering & Know Your Customer Program

The objectives of this anti-money laundering program ("Program") include defining, documenting, and supporting the implementation and maintenance of the policies, procedures, and safeguards. Madora, LLC has selected to comply with its obligations under various anti-money laundering and know your customer laws and regulations. This Program shall be reviewed and amended from time to time in light of expected further developments.

For all purposes under this Program, the term "client" shall include businesses for whom Madora LLC facilitates the acceptance of virtual currencies and the term "user" shall apply to any person who purchases goods or services from the aforementioned "clients".

1. Compliance Officer. The Compliance Officer designated on Exhibit A (the "Compliance Officer") will be the anti-money laundering compliance officer of Madora LLC. The Compliance Officer will be responsible for the overall compliance by Madora LLC with anti-money laundering laws and regulations in effect and applicable to the nature in which Madora LLC engages in commerce. The duties of the Compliance Officer shall include:

- (a) identifying and educating all principals (e.g., partners, members, and managers of our management entities), directors, officers, employees, and other persons (the "Covered Persons") about this program who the Compliance Officer believes are or may be involved in transactions or operations covered by anti-money laundering laws and regulations;
- (b) serving as the authorized officer for our collection of and response to information requests about clients, users, or transactions of the Madora LLC as may be required by anti-money laundering laws and regulations;
- (c) coordinating an annual audit of this Program as described below;

(d) establishing and maintaining the recordkeeping system as described below; and

(e) periodically reviewing this Program and recommending amendments from time to time to reflect changes in anti-money laundering laws and regulations in the relevant jurisdictions.

In fulfilling such duties and responsibilities under this Program, the Compliance Officer shall consult with internal or external counsel of Madora LLC or other knowledgeable anti-money laundering experts as designated by counsel.

2. Covered Persons. For purposes of this Program, the Compliance Officer will list all Covered Persons on Exhibit A and update such list as may be needed from time to time. Each Covered Person will be notified of such status by the Compliance Officer (see Exhibit B) and will be expected to follow the policies, procedures, and requirements of this Program.

3. Currency. Madora LLC delivers payment solutions built on the Nano network. Transactions are denominated in the native currency or coin of the network, Nano, which may be referred to as Nano, nano, NANO, XNO, or by its Unicode symbol X. The Compliance Officer will revisit and revise this Program should Madora LLC offer additional payment solutions with other networks.

4. Anti-Money Laundering & Know Your Customer Procedures for Clients. The follow will apply to new and existing clients:

(a) All current and potential clients interested in utilizing the services of Madora LLC must submit sensitive information and pass background checks before on-boarding to the platform. Any interested clients who fail to submit proper documentation will not be able to access the services of Madora LLC. Data and information required for on-boarding includes but is not limited to: proof of good standing in the jurisdiction(s) the client operates in, name, address, photo identification of beneficial owners, description of business activities with pricing of products or services sold by the business, any existing KYC/AML program of the client, industry specific certification documents or disclosures, etc.

(b) Clients will need to submit any and all digital wallet addresses that they use to send or receive Nano. These addresses will be checked on the blockchain to see if the address is connected to any addresses associated with known hacks or thefts

(c) The Compliance Officer will direct an initial review of all existing clients to determine whether beneficial owners of a business appear on the list of Specially Designated Nationals and Blocked Persons (the "SDNs List") published periodically by the US Treasury Department's Office of Foreign Assets Control ("OFAC").

(d) Due to the nature or uncertainty of regulations in some industries, from a risk assessment perspective, Madora LLC will not engage with clients involved in the sale or distribution of firearms, tobacco, alcohol, adult entertainment, or marijuana. If

regulations around these industries evolves at a federal level, the Compliance Officer will revisit the Program.

(e) If any existing client or beneficial owner of a client appears on the SDNs List, an immediate hold will be placed on such client's account (or such other action as the Compliance Officer determines, after consulting counsel or other anti-money laundering experts if appropriate, if such investor does not maintain an account with us), such client's name will be added to an Account Hold List which the Compliance Officer will maintain (see Exhibit C), and the Compliance Officer will file a report of such action as required by anti-money laundering laws and regulations (see Exhibit D).

(f) No transfers in or out of any account on the Account Hold List will be permitted without approval by the Compliance Officer. The Account Hold List will be updated under the direction of the Compliance Officer immediately prior to any event that will result in transfers in or out of accounts.

(g) The Compliance Officer will direct an initial review of new clients to determine whether any clients' beneficial owners are citizens of, have provided an address in, or are organized under the laws of any country for which OFAC has a sanctions program in place (a "Blocked Country").

(h) If any client is a citizen of, has provided an address in, or is organized under the laws of a Blocked Country, the Compliance Officer will determine, after consulting counsel or other anti-money laundering experts if appropriate, what further actions, if any, need to be taken with respect to such group.

(i) The Compliance Officer will direct an initial review of new clients to determine whether any clients' beneficial owners are Politically Exposed Persons (PEP's). This Program does not currently outline or cover processes necessary to handle clients who are PEP's and as such, Madora LLC currently does not on-board or service any clients who fall in this category.

5. Anti-Money Laundering & Know Your Customers Procedures for Users. The following procedures will apply to all end users who engage with the services of Madora LLC:

(a) Data and information will be collected on all users by either Madora LLC or will be provided by the client. Transactions will not be facilitated for any users who fail to provide basic information.

(b) Users will need to provide first name, last name, address, email, province or state, and country in order for a transaction to be facilitated

(c) Additional user data will be retrieved through the Nano network where a user's digital wallet will be matched to their provided data

(d) No data provided by users will be shared, except in response to a valid request by a regulatory body with appropriate jurisdiction

(e) Users will be required to submit additional information to fulfill KYC/AML requirements should the total transactional amount in dollars exceed \$600. This threshold is subject to change. Should any data point indicate a user has passed this limit, or has obfuscated Madora LLC's attempt to monitor its activity under this limit (through the creation of multiple accounts, the provision of phony or fraudulent identifying information, or other means), the user will be flagged and clients using our service will automatically reject the user from making a purchase. The user will be able to continue with purchases once they have submitted additional identifying information to either the client or Madora LLC.

(f) Limits on transactions are subject to both state and federal regulations. If new regulations at either the state or federal level dictates new KYC/AML requirements, Madora LLC may limit users ability to send payments based on their location.

6. Cash Transactions. Madora LLC shall not accept, exchange, or send any cash or cash equivalents (e.g. minted coins, sovereign currency, cashier's checks, bank drafts, traveler's checks, or money orders) on behalf of any client or user.

7. Suspicious Activity. All Covered Persons must immediately inform the Compliance Officer of any transaction, person, or entity that may raise any money laundering concerns under this Program. Examples of suspicious activity which must be reported include requests to send cryptocurrency to or accept cryptocurrency from an exchange on behalf of any client or user. Any potential transactions Madora LLC is asked to facilitate that do not align with the pricing or normal activities of the client will be rejected; the client will then be placed on the Account Hold List until the suspicious behavior is analyzed and proper action is taken.

8. Employee Training Program. The Compliance Officer will provide a copy of this Program along with a cover memorandum (a copy of which is attached hereto as Exhibit B) to all Covered Persons. The Compliance Officer will be responsible for answering all questions relating to this Program and will arrange for any additional training as may be required under anti-money laundering laws and regulations.

9. Recordkeeping. The Compliance Officer will establish a recordkeeping system in order to effectively administer this Program and in accordance with anti-money laundering laws and regulations. Information to be collected and documents which shall be retained include:

- (a) all documents and information related to client and user identification and on-boarding;
- (b) transactional data of users
- (c) all reports sent to federal or state licensing or regulatory bodies.
- (d) all versions of the Account Hold List;
- (e) a copy of this Program (with Exhibits) and all subsequent amendments (including amendments to the Exhibits);

(f) financial records of all money and transactions that occur through our services.

10. Confidentiality. All communications made hereunder with respect to money laundering concerns involving any person (including, reports given to various regulatory bodies shall only be made in accordance with our privacy policy and other applicable anti-money laundering laws and regulations, including the USA Patriot Act. If a valid request is made by a regulatory body with appropriate jurisdiction, Madora LLC may be required to share sensitive data mentioned in the Recordkeeping, Client KYC/AML, or User KYC/AML sections.

11. Foreign Jurisdictions. This Program does not address the anti-money laundering laws and regulations of any applicable foreign jurisdiction nor does it amend or supersede any such policies or procedures we currently have in place for foreign jurisdictions. The Compliance Officer will coordinate this Program with all anti-money laundering policies and procedures Madora LLC has in place for foreign jurisdictions now or anytime in the future.

12. Ongoing Compliance and Amendments. As necessary, the Compliance Officer will conduct periodic reviews of this Program, after consulting counsel or other anti-money laundering experts if appropriate, and, if necessary or appropriate, amend this Program to reflect developments in anti-money laundering laws and regulations applicable to Madora LLC.

13. Effective Date. This first effective date of this Program is March 17th 2022.

Compliance Officer:

Date:

EXHIBIT A

COMPLIANCE OFFICER AND COVERED PERSONS

Compliance Officer:

Patrick Reilly

In the absence of the Compliance Officer, Brandon Webster may serve as the Compliance Officer.

The following persons are Covered Persons under this Program:

Brandon Webster

EXHIBIT B

SAMPLE COVER MEMO TO COVERED PERSONS

To: [NAME OF COVERED PERSON]

From: [COMPLIANCE OFFICER]

Date: [DATE]

Re: Anti-Money Laundering Program

You are receiving a copy of our firm's Anti-Money Laundering Program and Know Your Client Program ("Program") because you have been designated as a Covered Person (as defined therein). Among the requirements of the Program are:

- an initial review of our clients and users against U.S. government published lists of terrorists and other suspect individuals and countries of origin;
- heightened scrutiny of new clients and users against these U.S. government lists;
- a review of controlled portfolio companies and portfolio companies in which our personnel serve as directors, officers, or employees to identify any "financial institutions" (a broadly defined term) subject to similar anti-money laundering program requirements;
- reporting procedures for suspicious financial activity; and
- additional information and representations required for new clients and users.

It is imperative that you read the Program very carefully and discuss any questions or concerns you may have with the Compliance Officer. Our firm is subject to potential fines for violations of anti-money laundering laws, and your adherence to the Program is mandatory and critical for our firm's success. The above-named individual will serve as our firm's Compliance Officer for anti-money laundering matters and will keep you informed as to any additional procedures or requirements we may adopt in the future.

By your execution in the space provided below, you acknowledge receipt of our Anti-Money Laundering and Know Your Client Program. You agree to abide by its requirements and prohibitions, and you acknowledge and agree that your failure to do so will result in disciplinary measures taken by our firm, up to and potentially including termination.

Signature

Date

Print Name

EXHIBIT C
ACCOUNT HOLD LIST

The following accounts are subject to our Program restrictions:

Name	Special Restrictions

EXHIBIT D

[INTENTIONALLY LEFT BLANK FOR ANY UPDATED REGULATIONS]