RESTRICTED JURISDICTIONS

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The Services provided by Trustyfi Sàrl, Geneva ("Trustyfi") through the platform at trustyfi.ch (the "Platform") are available only in select countries and regions. The Services are not available to certain categories of users due to regulatory, compliance, and legal considerations.

This document outlines the geographical restrictions and jurisdictional limitations applicable to the use of Trustyfi Services.

Please refer also to our AML compliance notice for more information.

1. PROHIBITED JURISDICTIONS

Trustyfi Services are expressly unavailable and prohibited for use by individuals, legal entities, and residents (including citizens, permanent residents, and persons domiciled) in the following countries and territories:

Abkhazia, Afghanistan, Albania, Algeria, American Samoa, Angola, Antigua and Barbuda, Bahamas, Bahrain, Bangladesh, Barbados, Belarus, Belize, Bolivia, Bosnia and Herzegovina, Botswana, Bouvet Island, British Indian Ocean Territory, Bulgaria, Burkina Faso, Burundi, Cambodia, Cameroon, Cayman Islands, Central African Republic, China (People's Republic of China), Cocos (Keeling) Islands, Comoros, Congo (Republic of the Congo), Congo (Democratic Republic of the Congo), Côte d'Ivoire (Ivory Coast), Croatia, Crimea Region, Cuba, Curaçao, Donetsk region of Ukraine, Ecuador, Egypt, Equatorial Guinea, Eritrea, Ethiopia, French Southern Territories, Gaza Strip, Ghana, Gibraltar, Guam, Guinea, Guinea-Bissau, Guyana, Haiti, Heard Island and McDonald Islands, Hong Kong, Iceland, Indonesia, Iran (Islamic Republic of Iran), Iraq, Jamaica, Japan, Jordan, Kenya, Kherson region of Ukraine, Kuwait, Kyrgyzstan, Laos (Lao People's Democratic Republic), Lebanon, Libya, Luhansk region of Ukraine, Mali, Mauritius, Mayotte, Micronesia (Federated States of Micronesia), Moldova (Republic of Moldova), Mongolia, Montenegro, Morocco, Mozambique, Myanmar (Burma), Namibia, Nepal, Netherlands, Netherlands Antilles, Nicaragua, Nigeria, North Korea (Democratic People's Republic of Korea), North Macedonia (Republic of North Macedonia), Northern Mariana Islands, Pakistan, Palestine (State of Palestine), Panama, Philippines, Pitcairn Islands, Puerto Rico, Qatar, Russian Federation (Russia), Rwanda, Saint Helena, Ascension and Tristan da Cunha, Samoa, São Tomé and Príncipe, Senegal, Sevastopol, Seychelles, Singapore, Somalia, South Africa, South Sudan, Sri Lanka, Saint Lucia, Sudan, Syria (Syrian Arab Republic), Tanzania (United Republic of Tanzania), Thailand, Tokelau, Tonga, Trinidad and Tobago, Tunisia, Turkey, Turks and Caicos Islands, Tuvalu, Uganda, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland, United States of America (including all U.S. territories and possessions), United States Minor

Outlying Islands, Uzbekistan, Vanuatu, Vatican City (Holy See), Venezuela (Bolivarian Republic of Venezuela), Vietnam, Virgin Islands (U.S.), Wallis and Futuna, West Bank, Western Sahara, Yemen, Zaporizhzhia region of Ukraine, Zimbabwe.

2. SANCTIONED JURISDICTIONS

In addition to the expressly prohibited jurisdictions listed above, Trustyfi Services are unavailable and restricted for use by individuals and legal entities who are:

- Residents, citizens, or nationals of countries or territories subject to comprehensive economic sanctions
- Individuals or entities designated on sanctions lists, including but not limited to:
    - European Union (EU) consolidated sanctions list
    - United Nations (UN) Security Council sanctions lists
    - Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) list and other OFAC sanctions programs
    - United Kingdom (UK) Office of Financial Sanctions Implementation (OFSI) consolidated sanctions list
    - Swiss sanctions lists maintained by the State Secretariat for Economic Affairs (SECO) under the Embargo Act (SR 946.231), which are binding on Trustyfi, and other applicable national sanctions regimes
- Individuals or entities owned, controlled by, or acting on behalf of sanctioned persons or entities
- Individuals or entities located in, organized under the laws of, or ordinarily resident in sanctioned jurisdictions
- In addition, in accordance with Art. 20(2) of the Swiss Ordinance of 4 March 2022 on Measures in connection with the Situation in Ukraine (SR 946.231.176.72), as amended with effect from 26 February 2026, Trustyfi does not provide crypto-asset services to Russian nationals, natural persons residing in the Russian Federation, or legal persons, undertakings or entities established in the Russian Federation. Pursuant to Art. 20(3) of that Ordinance, this prohibition does not apply to Swiss nationals, nationals of an EEA member state or of the United Kingdom, or natural persons holding a temporary or permanent residence permit in Switzerland, an EEA member state or the United Kingdom.

Note: Sanctions lists are updated frequently. Trustyfi monitors applicable sanctions lists and reserves the right to immediately suspend or terminate Services to any user who becomes subject to sanctions.

3. HIGH-RISK JURISDICTIONS

Trustyfi Services are restricted for use by individuals and legal entities who are residents or nationals of countries and territories identified as high-risk jurisdictions by the Financial Action Task Force (FATF), including:

- Jurisdictions with strategic anti-money laundering (AML) and counter-terrorist financing (CTF) deficiencies identified by FATF
- Jurisdictions subject to FATF calls for enhanced due diligence or countermeasures
- Jurisdictions under increased FATF monitoring (commonly referred to as "grey list" jurisdictions)

For the current list of high-risk jurisdictions, please refer to the FATF public statements available at:

https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions.html

4. CONSEQUENCES OF NON-COMPLIANCE

If Trustyfi determines or has reason to believe that a user is located in, resident of, or accessing Services from a restricted jurisdiction, or is otherwise in violation of these restrictions, Trustyfi may, without prior notice:

- Immediately suspend or terminate the user's account and access to Services
- Cancel or reverse any pending transactions
- Freeze or withhold user funds or virtual assets pending investigation or as required by law
- Report the user and their activities to the relevant regulatory or law enforcement authorities
- Take any other action necessary to comply with applicable laws and regulations

Trustyfi shall not be liable for any losses, damages, or expenses arising from account suspension, termination, or fund freezing resulting from jurisdictional restrictions or non-compliance.

5. PROHIBITED USE OF VPNS AND CIRCUMVENTION TOOLS

Users are expressly prohibited from using virtual private networks (VPNs), proxy servers, or any other technologies or methods to circumvent geographical restrictions or to conceal their true location, residency, or citizenship.

Trustyfi employs technical measures to detect the use of VPNs and other circumvention tools. Use of such tools is grounds for immediate account suspension or termination.

6. CHANGES TO RESTRICTED JURISDICTIONS

Due to the rapidly evolving regulatory landscape for virtual assets and frequent changes in sanctions regimes, Trustyfi reserves the right to modify, update, or amend the list of restricted jurisdictions at any time without prior notice.

Users are responsible for regularly reviewing this document to ensure continued compliance. Continued use of Trustyfi Services constitutes acceptance of any changes to jurisdictional restrictions.