



# KYC / AML NOTICE

**AVX TOKEN SALE | COMPLIANCE & VERIFICATION NOTICE**

Effective Date: 19 October 2026

Avirvox Labs FZE LLC | Sharjah, United Arab Emirates

Official AVX compliance and verification notice • Version 1.0

## 1. PURPOSE, SCOPE AND COMPLIANCE FRAMEWORK

This KYC / AML Notice ("Notice") describes the identity verification, anti-money-laundering, counter-terrorist financing, sanctions screening and related compliance procedures applicable to participation in the AVX token sale conducted by Avirvox Labs FZE LLC ("Avirvox Labs", "Company", "we", "us" or "our").

**Legal Entity:** Avirvox Labs FZE LLC

**Formation Number:** 4424076

**Registered Address:** Business Centre, Sharjah Publishing City Free Zone, Sharjah, United Arab Emirates.

Avirvox Labs applies compliance procedures in accordance with applicable laws and its risk-based compliance framework.

These procedures are intended to verify eligible participants, identify applicable legal restrictions, prevent financial crime, reduce fraud and support the lawful operation of the AVX token sale.

The scope and timing of verification may vary according to the participant's circumstances, transaction characteristics, jurisdiction and applicable legal requirements.

Where verification is legally required before accepting a transaction, the required checks must be completed before participation proceeds.

Final AVX allocation or delivery may be withheld pending successful completion of applicable verification requirements.

This Notice should be read together with the AVX Token Sale Terms and Eligibility & Restricted Jurisdictions Policy.

## 2. INDIVIDUAL IDENTITY VERIFICATION

Individual participants may be required to provide information or documentation necessary to establish identity and eligibility, including:

- Full legal name.
- Date of birth.
- Residential address and country of residence.
- Nationality or citizenship where legally relevant.
- Email address and contact information.
- Government-issued identification.
- Proof of residential address.
- Wallet address associated with participation.
- Source-of-funds information where required.
- Other relevant supporting documents reasonably necessary for verification.

Avirvox Labs may verify submitted information through appropriate documentary, administrative or legally available verification methods.

The Company does not currently require facial recognition, biometric identification, selfie verification or automated liveness checks as part of its standard participation process.

Additional verification measures may be introduced in the future only where operationally supported, legally appropriate and accompanied by any required participant notices.

Providing information does not guarantee approval or allocation.

## 3. LEGAL ENTITY VERIFICATION AND BENEFICIAL OWNERSHIP

Companies, partnerships, funds, trusts and other legal entities may be required to complete Know Your Business ("KYB") and beneficial ownership verification.

Information requested may include:

- Full legal entity name.
- Country of incorporation or establishment.

- Registration or incorporation number.
- Registered business address.
- Certificate of incorporation or equivalent formation documents.
- Details of directors and controlling persons.
- Authorized signatory information.
- Evidence of authority to participate.
- Ultimate beneficial ownership information.
- Identity documents for relevant beneficial owners or controllers.
- Source-of-funds information where required.

Avirvox Labs may request additional documentation where an entity's ownership structure, transaction characteristics or compliance risk reasonably requires further examination.

Participation through a legal entity must not be used to conceal prohibited beneficial ownership or circumvent applicable legal restrictions.

#### 4. SANCTIONS, POLITICALLY EXPOSED PERSONS AND PROHIBITED PARTICIPANTS

Participants may be subject to screening against sanctions lists, regulatory restrictions and relevant compliance information as required by applicable law and the Company's procedures.

Avirvox Labs will not knowingly accept transactions prohibited by legally applicable sanctions or other binding restrictions.

The Company may also assess politically exposed persons ("PEPs"), their relevant family members and close associates where appropriate.

PEP status does not automatically prohibit participation but may require additional verification or enhanced due diligence.

A possible screening match does not necessarily establish a legal prohibition. Such matches may be reviewed and clarified before a final determination is made.

Avirvox Labs may delay, restrict, reject or cancel participation where legally required or reasonably necessary to address substantiated sanctions, beneficial ownership or financial-crime concerns.

Funds subject to legally mandated restrictions or freezing requirements will be handled in accordance with applicable law and competent authority instructions.

#### 5. SOURCE OF FUNDS AND ENHANCED DUE DILIGENCE

Avirvox Labs may request additional information to establish the legitimate origin and ownership of funds or digital assets used for AVX participation.

Enhanced due diligence may apply where relevant risk indicators arise, including:

- Higher-value transactions.
- Complex ownership or control structures.
- Higher-risk jurisdictions.
- PEP exposure.
- Unusual or inconsistent transaction patterns.
- Material discrepancies in submitted information.
- Source-of-funds concerns.
- Adverse compliance information.
- Potential sanctions, fraud or other financial-crime indicators.

Additional verification may include source-of-funds declarations, supporting financial records, source-of-wealth information, explanations of transaction activity and relevant ownership documentation.

There is no single universal transaction threshold under this Notice that automatically determines whether enhanced due diligence applies.

Any mandatory verification thresholds or procedures imposed by applicable law will take precedence.

Avirvox Labs may decline or delay participation where required information cannot be reasonably verified or where compliance concerns remain unresolved.

## 6. WALLET AND TRANSACTION SCREENING

Participants must control, or be legally authorized to use, the wallet associated with their AVX participation.

Wallet addresses and transactions may be reviewed using available blockchain records, transaction information, compliance procedures or appropriately authorized external services.

The extent of screening will depend on applicable legal requirements, available capabilities and assessed transaction risk.

Participants must not knowingly use wallets or transaction arrangements connected to unlawful activity or intended to circumvent applicable requirements.

Relevant risk indicators may include:

- Sanctions-related activity.
- Suspected stolen or compromised assets.
- Fraud or impersonation.
- Suspected money laundering or terrorist financing.
- Undisclosed third-party payment arrangements.
- Attempts to bypass applicable participation restrictions.

Avirvox Labs may request clarification, supporting documentation or additional verification where reasonable concerns arise.

The Company does not guarantee continuous blockchain monitoring, universal identification of prohibited wallets or detection of every potentially suspicious transaction.

## 7. VERIFICATION OUTCOMES AND RE-VERIFICATION

A verification assessment may result in:

- Approval.
- Pending additional information.
- Enhanced compliance review.
- Rejection.
- Expiry or a requirement for renewed verification.

Verification approval confirms only that the applicable checks have been satisfactorily completed at the relevant time.

It does not guarantee AVX allocation, jurisdictional eligibility, transaction acceptance or future participation.

Additional or renewed verification may be required where:

- Identification documents expire.
- Material personal or entity information changes.
- Residence or legally relevant jurisdiction changes.
- Beneficial ownership or control changes.
- Transaction characteristics materially change.
- New sanctions or compliance concerns arise.
- Applicable legal requirements change.

The Company may suspend participation or token delivery pending completion of required re-verification, subject to the AVX Token Sale Terms and applicable law.

## 8. INFORMATION ACCURACY AND ANTI-CIRCUMVENTION

Participants must provide accurate, complete and current information when reasonably requested for compliance purposes.

Participants must not attempt to circumvent verification or eligibility controls through:

- False identities or fraudulent documents.
- Unauthorized use of another person's information.
- Undisclosed beneficial ownership.
- Unlawful third-party accounts or wallets.
- Multiple accounts or wallets intended to evade applicable controls.
- Intermediaries used to conceal prohibited participation.
- VPNs, proxies or other methods deliberately used to misrepresent relevant location information or evade legal restrictions.

Legitimate use of privacy-protection technologies or multiple wallets does not, by itself, constitute a violation.

Avirvox Labs may request additional verification, suspend participation or reject transactions where material inaccuracies, misrepresentations or prohibited circumvention are identified.

## 9. REJECTED PARTICIPATION AND REFUND HANDLING

Submitting information, completing verification or initiating payment does not automatically guarantee acceptance into the AVX token sale.

Where participation is rejected, suspended or cancelled following verification, any funds already received will be handled in accordance with Section 9 of the AVX Token Sale Terms and applicable law.

Where an eligible refund is approved or legally required, the amount will generally be calculated using the original USD-equivalent value of the contribution received and accepted through the official AVX participation system.

Refunds may be processed in USDT, USDC or another legally available payment method in accordance with the Token Sale Terms.

Eligible refunds will ordinarily be processed within 30 calendar days following final verification and approval, subject to applicable legal requirements, mandatory restrictions and legitimate processing delays.

Funds subject to lawful freezing, investigation or regulatory restrictions may be held or otherwise handled as required by applicable law.

Avirvox Labs will not retain participant funds merely because verification was unsuccessful where such retention would be unlawful.

## 10. USE OF PERSONAL AND VERIFICATION DATA

Information collected through the AVX participation and verification process may be used, as applicable, for:

- Identity and entity verification.
- Jurisdictional eligibility assessments.
- Sanctions and PEP screening.
- Source-of-funds review.
- Fraud and financial-crime prevention.
- Payment and transaction reconciliation.
- Participant account administration.
- Security and compliance investigations.
- Legal and regulatory reporting obligations.
- Handling participation inquiries and disputes.

Avirvox Labs will process personal information for lawful, specified purposes and in accordance with applicable privacy and data-protection requirements.

Only information reasonably necessary for the relevant purpose should be requested and processed.

Where processing requires specific notices, authorizations or other legal conditions, the Company will apply the requirements relevant to that processing.

Further information regarding personal-data handling, participant rights and applicable privacy arrangements is provided in the Avirvox Labs Privacy and Cookie Policy.

## 11. THIRD-PARTY PROVIDERS AND DATA SECURITY

Avirvox Labs may engage qualified external service providers for identity verification, sanctions screening, blockchain analysis, compliance administration or related services where operationally appropriate.

The use of any such provider is subject to applicable legal, contractual, confidentiality and data-protection requirements.

Where authorized service providers are engaged, relevant participant information may be shared with them to the extent reasonably necessary for the specified verification or compliance purpose.

The Company will apply reasonable organizational and technical safeguards appropriate to the nature of the information processed and applicable legal requirements.

Access to sensitive participant information will be limited to authorized personnel and service providers with a legitimate need.

No electronic platform or data-processing system can guarantee absolute security.

Avirvox Labs does not require participants to provide wallet seed phrases, private keys or recovery credentials for identity verification or compliance purposes.

## 12. DATA RETENTION, REPORTING AND LEGAL COOPERATION

Verification, transaction and compliance records may be retained for periods necessary to meet applicable legal, regulatory, contractual, security and legitimate recordkeeping requirements.

Where applicable law prescribes a minimum retention period, that requirement will be followed.

Records may be retained for longer periods where lawfully required or justified by ongoing investigations, disputes, regulatory proceedings or enforcement of legal rights.

Personal information will not be retained indefinitely without a lawful basis.

Avirvox Labs may, where required or authorized by applicable law:

- Preserve relevant information and transaction records.
- Restrict or suspend transactions.
- Respond to lawful requests from competent authorities.
- Provide information pursuant to regulatory obligations or court orders.
- Make legally required reports or disclosures.
- Cooperate with authorized investigations.

Where applicable law restricts notification to a participant, the Company may withhold information concerning relevant investigations, reports or compliance measures.

Nothing in this Notice requires Avirvox Labs to disclose confidential reporting information where doing so would be unlawful.

## 13. RELATIONSHIP WITH OTHER POLICIES AND UPDATES

This Notice should be read together with:

- AVX Token Sale Terms.
- Eligibility & Restricted Jurisdictions Policy.
- Privacy and Cookie Policy.

- Official Avirvox Labs Whitepaper.
- Applicable private or strategic subscription documentation.

The AVX Token Sale Terms govern purchase confirmation, token allocation, cancellation, applicable refunds and related contractual rights.

The Eligibility & Restricted Jurisdictions Policy governs participant eligibility and jurisdictional assessment.

The Privacy and Cookie Policy provides the applicable framework for processing personal information.

Where a mandatory legal requirement imposes a stricter obligation than a published policy, the applicable legal requirement will prevail.

Avirvox Labs may update this Notice to reflect changes in applicable law, compliance procedures, operational capabilities or relevant risk controls.

Material changes affecting previously confirmed contractual rights will be handled in accordance with the Token Sale Terms and applicable law.

## 14. OFFICIAL CHANNELS AND CONTACT

Participants are responsible for providing accurate information, responding to legitimate verification requests, protecting wallet credentials and using only official Avirvox Labs communication and participation channels.

Avirvox Labs will never request wallet seed phrases, private keys or wallet recovery credentials.

### **Avirvox Labs FZE LLC**

Business Centre, Sharjah Publishing City Free Zone

Sharjah, United Arab Emirates

**Email:** coin@avirvox.io

**Official Website:** <https://www.avirvox.io>

For questions regarding verification, compliance requirements or AVX participation, participants should contact the Company through its official communication channels.

## IMPORTANT NOTICE

Participation in the AVX token sale remains subject to applicable laws, eligibility requirements, required compliance procedures and the binding AVX Token Sale Terms.

Completion of identity verification does not guarantee participation or token allocation.

Avirvox Labs may undertake additional verification, restrict participation or comply with legally required investigations and reporting obligations where appropriate.

Participants should provide accurate information and independently assess the legal requirements applicable to their participation.