

KNOW YOUR CUSTOMER (KYC) PROTOCOL

For the Epolleo Diversity Platform, Operated by Epolleo, Inc.

Effective Date: 7-1-2025

1. INTRODUCTION This Due Diligence and Know Your Customer ("KYC") Protocol governs the onboarding and verification procedures for all users, organizations, institutions, and partners (collectively, "Participants") seeking access to the Epolleo Diversity Platform ("Platform"). Operated by Epolleo, Inc., a nonprofit entity incorporated in the State of South Dakota, the Platform enables the registration, analysis, and commercialization of microbial samples and associated biodiversity credits ("Diversity Credits").

Participation in the Platform requires completion of the due diligence process described herein. These protocols ensure compliance with applicable laws and promote transparency, integrity, and accountability.

2. PURPOSE AND LEGAL BASIS This document establishes the standard process and requirements for verifying Participants to prevent misuse of the Platform, including fraud, money laundering, terrorism financing, and unauthorized commercialization of scientific data.

The Protocol is governed by:

- U.S. PATRIOT Act and Bank Secrecy Act (BSA)
- Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) standards
- Financial Action Task Force (FATF) Recommendations
- South Dakota Codified Law §51A-17
- Applicable federal nonprofit regulations and ethical research standards

3. PRINCIPLES GOVERNING THE DUE DILIGENCE FRAMEWORK All due diligence activities shall be guided by the following principles:

- **Transparency:** All project and user data must be clear, auditable, and openly traceable.
- **Integrity:** Platform integrity must be preserved through accurate record-keeping and user honesty.
- **Confidentiality:** Sensitive data will be protected and only shared with authorized personnel.
- **Security:** Robust digital controls will prevent unauthorized access or manipulation.
- **Scientific Responsibility:** All user activity must align with ethical standards for biodiversity preservation.

4. ELIGIBILITY AND PARTICIPANT TYPES All Participants must complete this protocol before being granted access. Participant types include:

- **Contributors:** Students, educators, and citizen scientists submitting microbial samples.
 - **Researchers:** Institutions with data access or sequencing privileges.
 - **Licensees:** Industry or private entities applying for Diversity Credit use or commercialization.
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5. REQUIRED DOCUMENTATION Each Participant must provide the following for initial screening:

- IRS EIN, SSN, or equivalent tax ID number
 - Legal entity formation documents (Articles of Incorporation, etc.)
 - Government-issued photo identification of the authorized signatory
 - Certificate of Good Standing (if applicable)
 - Bank letter or account verification for license or royalty transactions
 - Grant award documentation (SBIR/STTR or equivalent, if applicable)
 - Institutional affiliation confirmation for academic entities
 - Shareholder or ownership registry for private entities with more than 5% ownership per person
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6. PROCESS AND REVIEW TIMELINE

1. **Submission Phase:** Participant submits documents via secure upload.
2. **Initial Screening (10 business days):** Compliance Officer reviews documentation.
3. **Extended Review (if required):** Additional verification may extend the timeline to 30 business days.
4. **Approval or Rejection:** Written notification is provided. Rejected applicants may request reconsideration.

Epolléo reserves the right to deny access or suspend accounts at any point during the review process.

7. RISK SEGMENTATION AND EVALUATION Risk is segmented according to:

- Nature and origin of funds
- Jurisdiction of entity formation
- Volume and type of transactions
- Role of politically exposed persons (PEPs)
- Affiliation with sensitive jurisdictions or red-flagged institutions

High-risk profiles will undergo enhanced due diligence.

8. GOVERNANCE AND ROLES

- **Compliance Officer:** Conducts reviews, flags risks, and manages documentation.
- **External Advisor:** Provides independent assessments when risk is present.
- **CEO and Executive Oversight:** Final decision authority.
- **Ethics and Science Oversight Committee:** May review complex or contested accounts.

9. SECURITY AND DATA USE All data is handled under applicable U.S. privacy laws. Information is encrypted and stored in secured, access-controlled digital environments.

- Epolleo shall not sell or distribute Participant data.
- Participants consent to anonymized use of project data for reporting and ecosystem tracking.

10. DENIAL, TERMINATION, AND APPEALS Access may be denied or revoked for:

- Incomplete or false documentation
- Links to criminal, terrorist, or environmental exploitation
- Breaches of security or ethics protocol

Appeals may be submitted in writing within 30 days of decision.

11. GOVERNING LAW AND JURISDICTION This document shall be governed by the laws of the State of South Dakota and the United States of America. Disputes will be resolved in the courts of Minnehaha County, South Dakota, unless arbitration is agreed upon in writing.

12. AMENDMENTS Epolleo reserves the right to amend this Protocol with 30 days' public notice. Continued participation constitutes acceptance of amended terms.

13. CONTACT INFORMATION Epolleo, Inc.
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