Compliance Overview

One-page summary of Trnznd's compliance, KYC/AML, reserve oversight and control framework

Issuer: Trnznd SA **Asset:** ZEND **Version:** 1.0 **Effective Date:** 3rd July 2026

Summary

Trnznd SA is the sole issuer and administrator of ZEND. Its compliance framework is designed to support verified-user access, financial-crime prevention, reserve integrity, operational resilience, data protection, and transparent governance. This overview is informational and should be read together with the Terms & Conditions, Relevant Information Document, Risk Disclosure Statement, Privacy Policy, Complaints Handling Policy, and Governance Framework.

Core Compliance Controls

KYC and onboarding. Users must complete identity verification before accessing primary issuance, redemption, or institutional functionality. Institutional users may be subject to corporate verification, beneficial ownership review and authorised-representative checks.

AML/CFT programme. Trnznd applies a risk-based financial-crime framework covering customer due diligence, source-of-funds review, source-of-wealth review where required, enhanced due diligence and periodic or event-driven reviews.

Sanctions and PEP screening. Users, beneficial owners, linked accounts and relevant wallet addresses may be screened against sanctions, politically exposed person and adverse-media sources before and during the relationship.

Transaction monitoring. Transactions may be monitored for unusual patterns, prohibited activity, sanctions exposure, fraud indicators, high-risk blockchain exposure and inconsistencies with the user's expected profile.

Restricted activity. Trnznd may reject, delay, suspend, restrict or terminate access where required for AML/CFT, sanctions, fraud-prevention, legal, court-order, law-enforcement or regulatory reasons.

Governance and Accountability

Board oversight. Material policies, compliance matters, significant incidents, reserve controls and risk exposures are escalated through defined governance channels.

Reserve and Operational Controls

Reserve backing. ZEND is designed to be supported by reserve assets with a value at least equal to outstanding ZEND obligations, subject to the Terms and reserve-management framework.

Reserve management. The reserve is managed conservatively with a focus on capital preservation, liquidity, diversification, short-duration instruments, high-quality liquid assets and controlled counterparty exposure.

Daily reconciliation. Outstanding ZEND liabilities are reconciled against reserve assets, with exceptions reviewed and escalated under documented treasury, risk and governance procedures.

Wallet controls. Wallet ownership verification, address screening, verified-user controls, role-based access, multi-signature arrangements and audit logging support platform integrity.

Technology controls. Cybersecurity, access management, change control, incident response, business continuity and secure development practices support the reliability of Trnznd systems.

Transparency and User Protection

Independent assurance. Trnznd may publish reserve reports, attestations, audits, operational updates and other transparency materials where available and appropriate.

Privacy and data controls. Customer data is used for its intended compliance and operational purposes, with access restricted to authorised personnel and where necessary service providers.

Complaints handling. Complaints are received, acknowledged, investigated and resolved under a documented complaints process with escalation where appropriate.

Segregation of duties. Operational, compliance, treasury and technology responsibilities are separated to reduce conflicts, execution risk and the risk of unilateral action.

Dual control. Sensitive actions, including material minting, redemption, reserve movements, administrative overrides and emergency controls, are subject to dual authorisation or escalation.

Record keeping. Compliance, onboarding, monitoring, transaction, complaint, audit, reconciliation and governance records are retained in accordance with Trnznd policies and applicable requirements.

This document is a concise compliance summary only. It does not replace or amend any binding Trnznd legal documentation. In the event of inconsistency, the applicable Terms & Conditions, RID or other binding document shall prevail.