

Onboarding and Tokenization Process

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Part I: Customer Onboarding

Introduction

At BlocHome we emphasize the importance of being compliant with all the rules and regulations, especially regarding KYC and AML processes. Our dedicated team created this document which reflects our philosophy and culture about AML/KYC. Below, we are describing the mechanism behind our onboarding process and why it is compliant to AMLD5, GDPR, BSA & PSD2.

Step 1: SignUp

The customer arrives at Bloc Home's website. Then, he clicks on "Sign up" and gets redirected to the BlocHome platform to create an account. The platform is a white-labeled solution

provided by Tokeny. E-connect adapts the platform graphically to Bloc Home's requirements. After creating an account, the customer can navigate through the platform, but cannot purchase tokens yet as he first needs to complete the due diligence process.

Step 2: Due Diligence

If the customer decides to purchase tokens, he clicks on "INVEST" and will be directed to our due diligence process. The "ONBOARD" module is a white-labeled solution provided by LetzOlky and graphically enhanced by LetzToken. In this module, the customer needs to go through 6 steps:

1. **Customer identification** (slide 1-8)
2. **Investor type:** Individual or Institutional (Slide 9 and 10)
3. **Personal information:** In this step, the customer needs to enter his information according to our KYC/AML data matrix. Our data matrix has been reviewed by Opportunity to make sure that we are fully compliant to legal requirements.

* (Annex 1: KYC/AML data set) The client application will be screened according to the decision flow. * (Annexe 2: client evaluation decision process)

4. **Identity verification:** The customer will need to pass an identity verification check through an OlkyPass integration, which will screen the validity of the customer's identification document, then produce a document report. OlkyPass will at the same time perform an enhanced watchlist check. The entire report can be accessed through our internal dashboard.
5. **KYC block step:** In this step the customer can't continue and has to wait up to 72 hours until the Support team has screened him. Once a customer has been whitelisted, he can proceed with the process.
6. **Wallet:** The customer will need an Ethereum wallet in order to purchase and receive tokens. If the customer doesn't have a wallet already, he can create an Self-Custody wallet in this step. In one click, the customer creates a wallet through our module.
7. **Payment:** If the customer has passed our KYC/AML screening process, he gets whitelisted as an investor. As such he gets passed to "payment" in which he orders the desired number of tokens. Afterwards he will receive a payment reference and can pay through a bank transfer. If the customer has failed due diligence, he will not be able to purchase tokens as he needs to be a whitelisted investor.
8. **Confirmation:** In this section, the customer can check the status of the due diligence process (pending, verified, additional information required, rejected) and his payment process (confirmed, not confirmed)

Payment

If the customer has passed our KYC/AML screening, he is whitelisted as an investor and is passed to "Payment", where he orders the desired number of tokens. He receives a payment reference and pays via bank transfer. If the customer has failed due diligence, he cannot purchase tokens, as he must be a whitelisted investor.

Confirmation

In this section, the customer can check the status of the due diligence process (pending, verified, additional information required, rejected) and his payment process (confirmed, not confirmed).

Token Issuance

Once the customer has passed all steps, been whitelisted after completing our legally compliant KYC/AML process, and paid the ordered amount, LetzToken transfers the ordered token amount to the customer's wallet. The wallet secures the client's tokens. LetzToken automatically registers each action, contract and transaction on the Ethereum blockchain, where the data is safe, transparent and secure.

Regarding tokenomics, only LetzToken is able to mint, burn, block and issue tokens. If, for example, a client account gets hacked and tokens stolen, LetzToken can trace the stolen tokens, burn them and replace them on the client's account.

Slides 6-14 of the source deck contain visual screenshots of the onboarding walkthrough (sign-up, identity capture, wallet creation, payment screens). These are not reproduced as text and should be referenced from the original presentation.



Continuer vers votre passeport OlkyPass

Pour continuer, veuillez entrer votre adresse e-mail. Si vous n'avez pas encore de passeport OlkyPass, nous vous enverrons un e-mail pour en créer un.

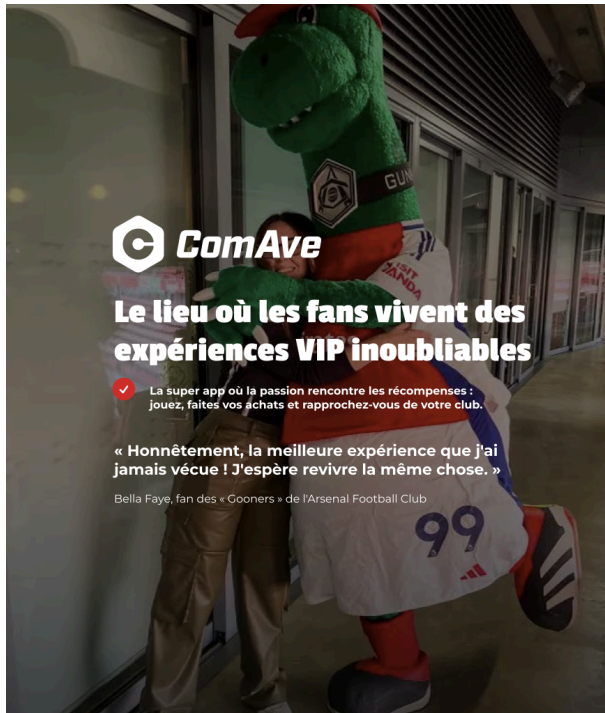
Adresse e-mail *

john.doe@olky.eu

Continuer >

Le Passeport OlkyPass est un service hautement sécurisé de vérification d'identité (KYC) permettant aux sociétés du groupe Olky et à ses partenaires d'identifier leurs clients pour se conformer à leurs obligations réglementaires. Lors de votre première utilisation du service, un compte OlkyPass vous sera attribué. Depuis ce compte, vous pourrez gérer vos données personnelles qui ne seront jamais communiquées à des fins commerciales.

Vos données personnelles sont traitées par le Groupe Olky pour gérer votre demande. Vous disposez d'un droit d'accès, de rectification, d'effacement, de portabilité et de limitation du traitement de vos données sous réserve du respect d'obligations légales et réglementaires décrites dans notre politique de confidentialité. Pour en savoir plus sur vos droits et la gestion de vos données personnelles, vous pouvez consulter notre politique de confidentialité. [Privacy Policy](#)

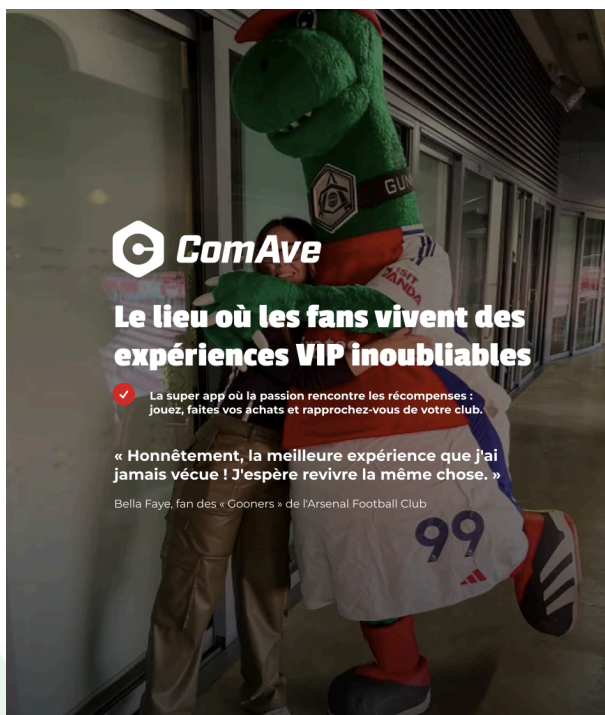


Le lieu où les fans vivent des expériences VIP inoubliables

✓ La super app où la passion rencontre les récompenses : jouez, faites vos achats et rapprochez-vous de votre club.

« Honnêtement, la meilleure expérience que j'ai jamais vécue ! J'espère revivre la même chose. »

Bella Faye, fan des « Gooners » de l'Arsenal Football Club



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« Honnêtement, la meilleure expérience que j'ai jamais vécue ! J'espère revivre la même chose. »

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Ajoutez un numéro de téléphone

Ce numéro de téléphone sera utilisé pour la récupération de votre OlkyPass en cas de nécessité.



+33 XX XX XX XX XX

✓ J'ai lu et j'accepte [les conditions d'utilisation et la politique de confidentialité](#).

Continuer >



Qui êtes-vous ?

Dites-nous en un peu sur vous :

Je suis *

☐ Un homme ☐ Une femme

Prénom *

jean

Autres prénoms

(tels qu'ils apparaissent sur votre pièce d'identité)

Joe

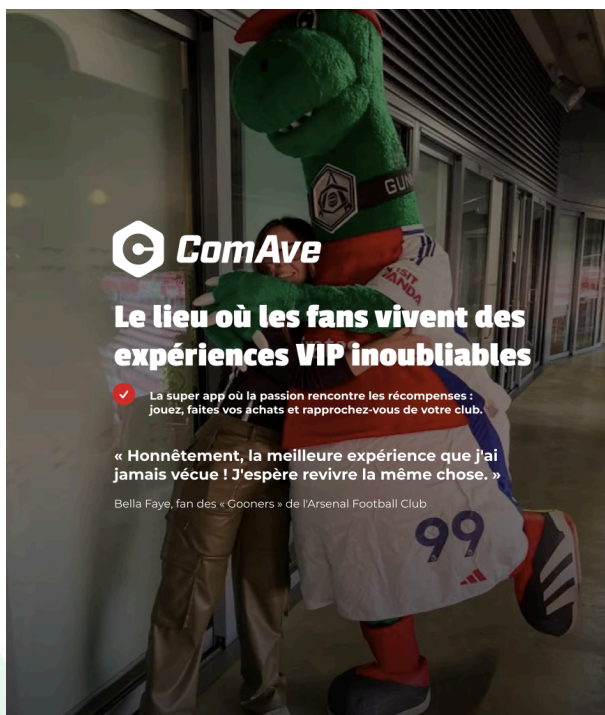
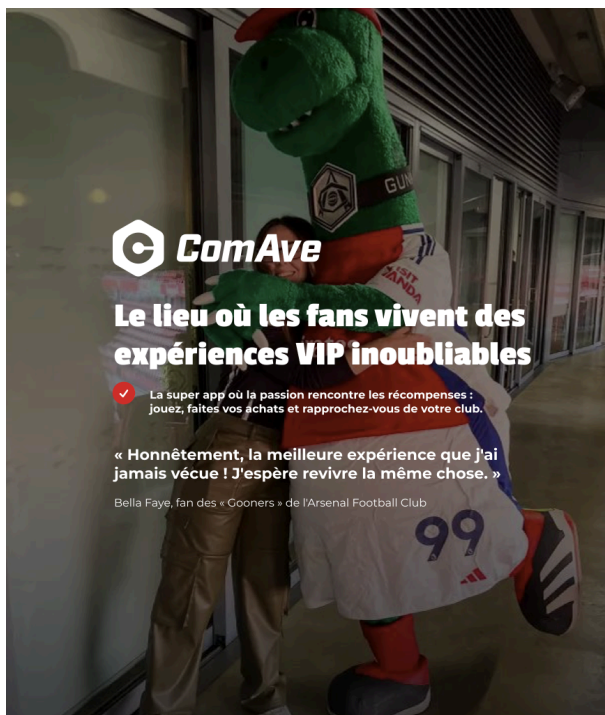
Nom de naissance *

(tel qu'il apparaît sur votre pièce d'identité)

jean



Continuer >



Où et quand êtes-vous né(e) ?

Indiquez votre date et lieu de naissance.

Date de naissance *

JJ/MM/AAAA

Pays de naissance *

Sélectionner un pays

Ville de naissance *

Ville



Continuer >



Sélectionnez votre nationalité

Nationalité *

Nationalité

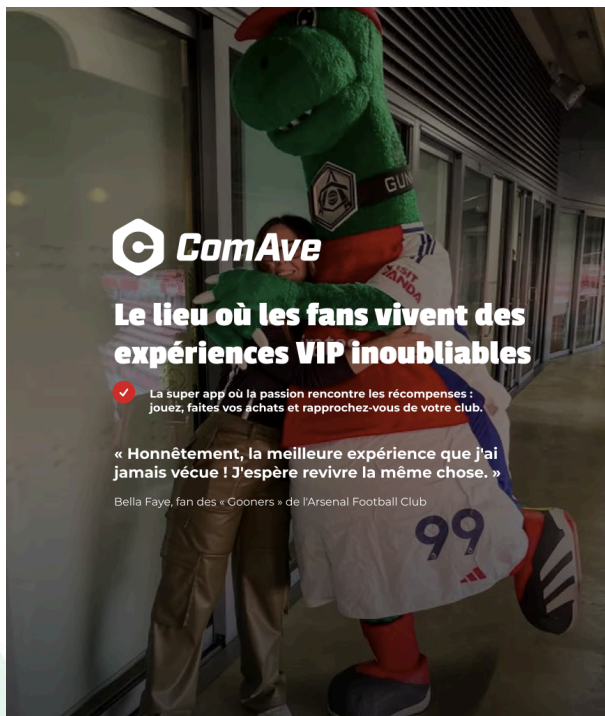
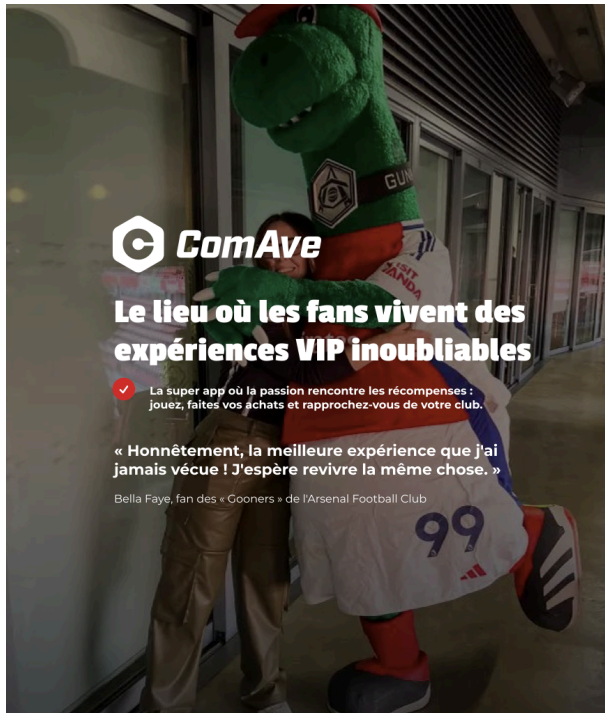
Avez-vous une ou plusieurs autre(s) nationalité(s) que celle indiquée ci-dessus ?

☒ Oui ☐ Non

+ Ajouter une nationalité



Continuer >



Où vivez-vous ?

Indiquez votre lieu de résidence actuel.

Numéro et nom de la rue *

Adresse

Code postal *

Code postal

Ville actuelle *

Ville

Pays actuel *

Pays

Continuer >



Résidence fiscale

Quel est votre numéro d'identification fiscale (NIF / TIN) ?

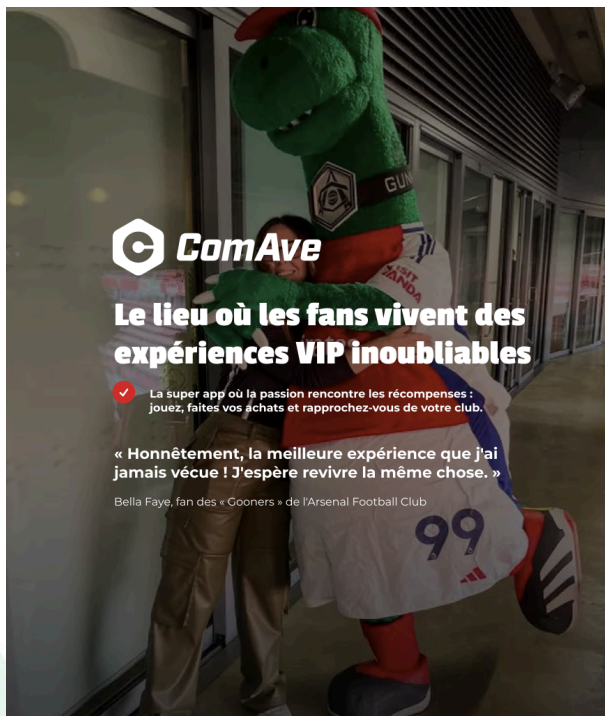
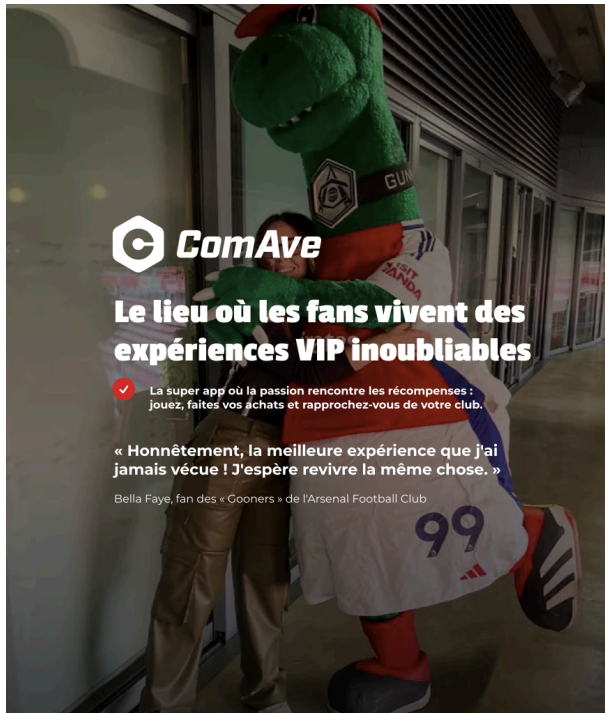
On considère que vous possédez votre résidence fiscale dans les pays où vous payez des impôts ou dans lesquels vous résidez physiquement pendant au moins six mois de l'année

Pays



N°identification fiscale

Continuer >



Parlez-nous de votre activité

Dites-nous en plus sur ce que vous faites.

Catégorie professionnelle (CSP) *

CSP



Continuer >



Quels sont vos revenus mensuels ? *

Moins de 1.500 €

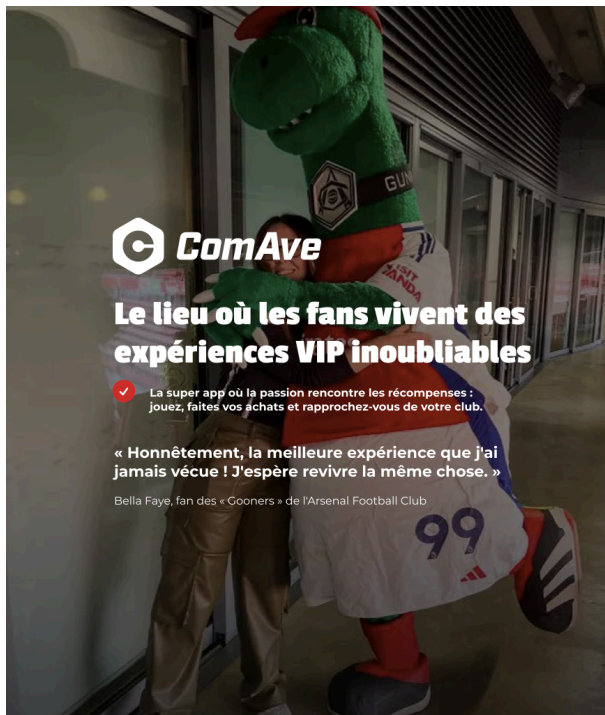
De 1.500€ à 5.000 €

De 5.000 € à 10.000 €

Plus de 10.000 €



Continuer >



Quelle est la nature de vos revenus ? *

- | | |
|--|--|
| ☐ Salaires | ☐ Dividendes et plus-values |
| ☐ Revenus fonciers | ☐ Chômage, allocations sociales |
| ☐ Pension ou retraite | ☐ Je n'ai pas de revenu stable |
| ☐ Droits d'auteur | ☒ Autres revenus |

Préciser quels autres revenus : *

Préciser



Continuer >

Internal process flow

Once the investor completes the personal data form, the information is processed in the OlkyPass platform. Within this tool, LetzToken team members evaluate the investor's profile, analyse watchlist reports and perform a risk analysis based on the results. The team then evaluates whether:

- The investor is whitelisted.
- Additional documents are required before a final decision is taken.
- The investor is a high-risk profile and will be screened by our external provider, Opportunity Financial Solutions.

Risk Rating

LetzToken received external consulting on the onboarding and due diligence process to be fully compliant with Luxembourgish and European law. LetzToken uses several data points to evaluate a client's risk score.

Residence / country

In the first phase, LetzToken only accepts clients with an EU passport and EU residence. Non-EU clients are rejected.

Occupation / sector of activity

As some economic sectors experience a higher risk of money laundering and financing of terrorism, LetzToken has created a risk matrix according to the recommendations of Tokeny and Opportunity Financial Services.

Politically exposed person (PEP)

A politically exposed person (natural person investor or director / UBO of the corporate investor) is automatically classified as a high-risk client.

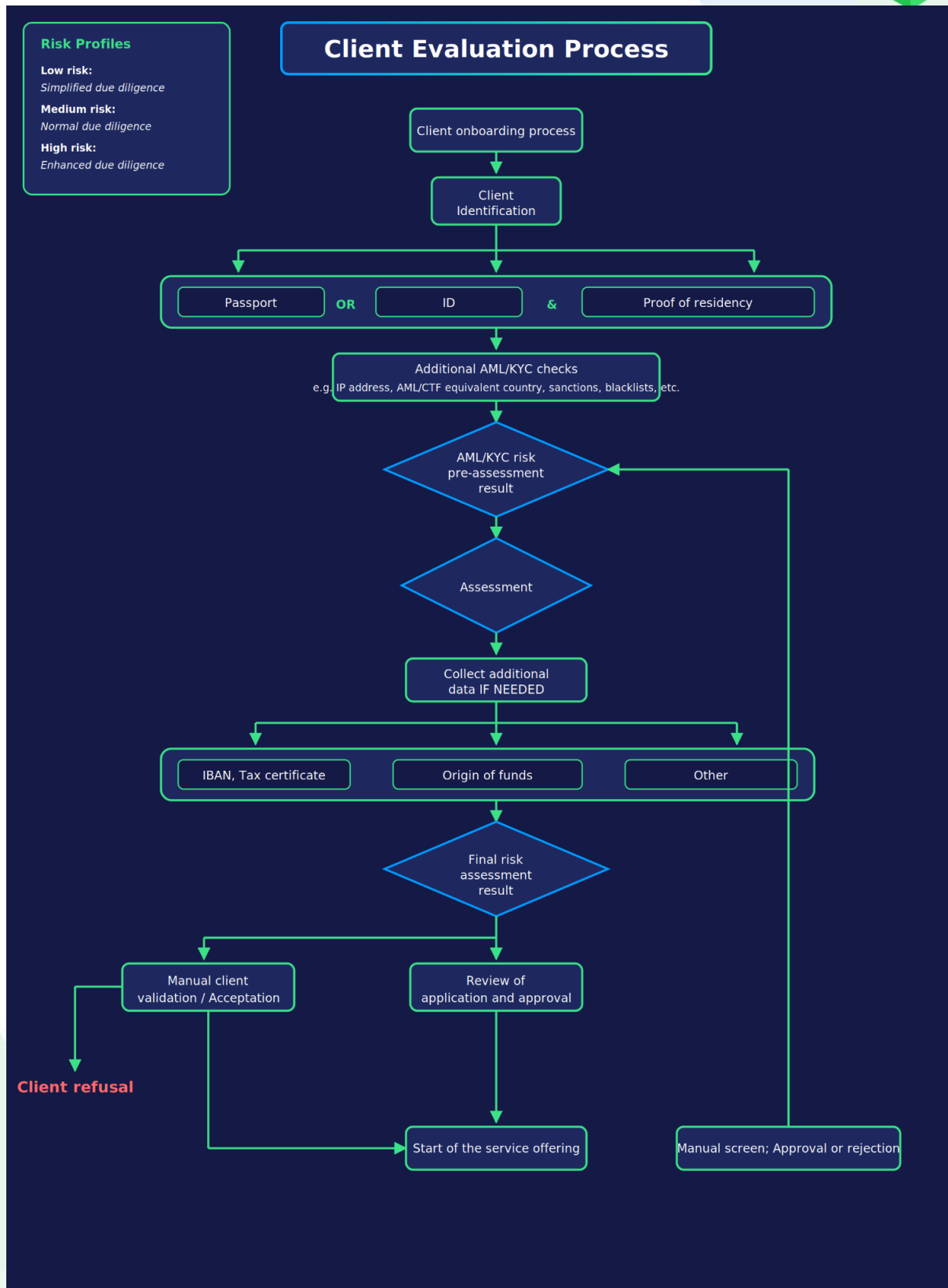
Retail customer identification

To identify a retail customer, the following documents are required, depending on risk level.

A. Low risk	B. Medium risk	C. High risk
Non-PEP person; EU member-state national; investment amount <€50,001	Non-PEP person; investment amount €50,001–€100,000; high salary; complex activity	PEP person; investment amount > €100,000

Copy of identity card / passport Proof of residence Origin of funds Periodic review every 3 years (or as legally required) Online ID check by OlkyPass Final validation after application check	Copy of identity card / passport Proof of residence Origin of funds Periodic review every 2 years (or as legally required) Online ID check by ONFIDO Final validation after application check	Document high-risk individuals Verify first transaction of origin of funds via an account in the PEP's name (e.g. small €1 amount) Apply additional monitoring of all transactions Annual review with possibility of being downgraded after one year of non-political activity Online ID check by ONFIDO Final validation after application check (outsourced)
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Annexe 1: Client Evaluation Process





Annex 2: Data points collected by LetzToken

Retail clients

Personal information collected:

- First name
- Last name
- Gender
- Date of birth
- Place of birth
- Nationality(ies)
- Residence : address
- Residence : city*
- Residence : country
- Passport / ID number
- Validity of passport / ID
- Matricule national (Lux) / personal tax number
- Email
- Mobile number
- Occupation / sector of activity*
- Source of funds
- Annual gross revenue
- Politically exposed person status*
- Investment amount

Documents required in the application:

- Identity card / passport
- Proof of residence

* Data used to compute risk level.

Institutional clients

BlocHome onboards institutional clients in a fully manual process, in which clients are invited to the office. The following data points are collected:

- Company name
- Legal form
- Registered address
- Registration number
- LEI / TIN
- VAT number
- Country of registration
- Incorporation date
- Business type
- Sector of activity
- Customer base description
- Sales channels
- Business description (min. 50 characters)
- Webpage
- Geographic scope of business

Contact details for the institutional representative:

- First name
- Last name
- Gender
- Role
- Date of birth
- Private address
- Business records

Annex 3: Data Flows

LetzToken will use a KYC/AML assessment based on the documents, data points and risk matrix explained in this document.

LetzToken screening process:

The collected information will be double-screened by two LetzToken team members. LetzToken will then screen the client for sanctions, PEP, media and commercial registry data. The clients will then be categorised into 3 different risk categories: low risk; medium risk; high risk. LetzToken will integrate an autostop function. For example, if a low-risk client decides to invest more than 10.000 Euro, he needs to complete the normal due diligence process as he has been moved up from the simplified due diligence process.

Low risk:

If no suspicious information has been found, the client will be accepted.

Medium risk:

Medium risk clients will be checked more intensely, if suspicious information are found, the client will be re-categorised to a high-risk client.

High risk:

These clients will be screened by Opportunity and the LetzToken team to assure that LetzToken's client approval remains fully compliant.

Liste de contrôle

Client : Jean-Paul SCHEUREN	Etablie par: Maroun Altekly
Dossier: 34023	Date: 03/11/2021
	Signature Evalueur:

Client personne physique		Mandataire (Finimmo)	
Fiche d'identification (pers. physique)	☒	Fiche d'identification (mandataire)	☐
Pièce d'identité	☒	Pièce d'identité	☐
Nom. Prénom.	☒	Nom. Prénom.	☐
Lieu et date de naissance	☒	Lieu et date de naissance	☐
Nationalité	☒	Nationalité	☐
Adresse	☒	Adresse	☐
			☐
Numéro d'identification officiel	☒	Numéro d'identification officiel	☐
Profession / Activité	☒	Profession / Activité	☐
Provenance des fonds	☒	-	
	☐	Relation client	
	☐	Mandat client	☐
Client personne morale (Finimmo)		Mesures complémentaires	
Fiche d'identification (pers. morale)	☐	Certificat de résidence	☐
Acte de constitution	☐	Facture pour vérification adresse	☒
Statuts coordonnés	☐		☐
Extrait RCS ou équivalent	☐	Recherches internet	☐
Adresse (siège, lieu d'activité)	☐		
Liste administrateurs/signat. autorisées	☐	Screening listes de sanctions	☒
Pièces d'identité dirigeants	☐		
Extrait RBE	☐	Analyse de risque	
Déclaration bénéficiaire(s) effectif(s)	☐	Matrice d'évaluation des risques	☒
Provenance des fonds	☐		
But de la relation	☐	Détermination du risque (voir ci-dessous)	
Organigramme. Structure de contrôle	☐	Faible	☒
Registre des actionnaires / associés	☐	Moyen	☐
Liste de présence dernière AG	☐	Elevé	☐
Preuve de la cotation (sociétés cotées)	☐		
		Mesures de vigilance	
Definition Token		Normale	☐
Montant d'investissement 3000.-€	☐	Simplifiée	☒
		Renforcée	☐

	☐	Mesures complémentaires de vigilance	☐ oui ☒ non
		Autres documents	
			☐
			☐
			☐

Matrice d'évaluation:

Statut:	☒ personne physique	☐ personne morale	
Montant d'investissement :	☒ <= 50 000	☐ > 50 001	☐ > 100 001
Pays de résidence:	☒ Grande Région	☐ EU	☐ hors EU
Nationalité:	☒ Grande Région	☐ EU / GB	☐ hors EU
PEP:	☐ oui	☒ non	
Sanction List check:	☒ négative (Green)	☐ positive (red)	

Conformity check:

Nom Responsable KYC/AML ou son représentant: Raphael SCHEUREN

Signature Responsable KYC/AML ou son représentant : _____

Date du contrôle: __03/11/2021__

Part II: Tokenization Ecosystem and Process

Shaping Web 3: services provided by the Olky Group

Through the GIE LëtzOlky, the following services are provided:

- KYC.
- Tokenization : minting and management of rights on tokens.
- Wallet as a service.*
- Processing of FIAT and crypto flows.

** Wallet as a service will be performed by OlkyWallet once the MiCAR licensing is obtained (for RWA tokens only). Until then, LetzOlky provides only ID for token transfers within public keys.*



The LetzOlky platform: "à la carte" Olky services

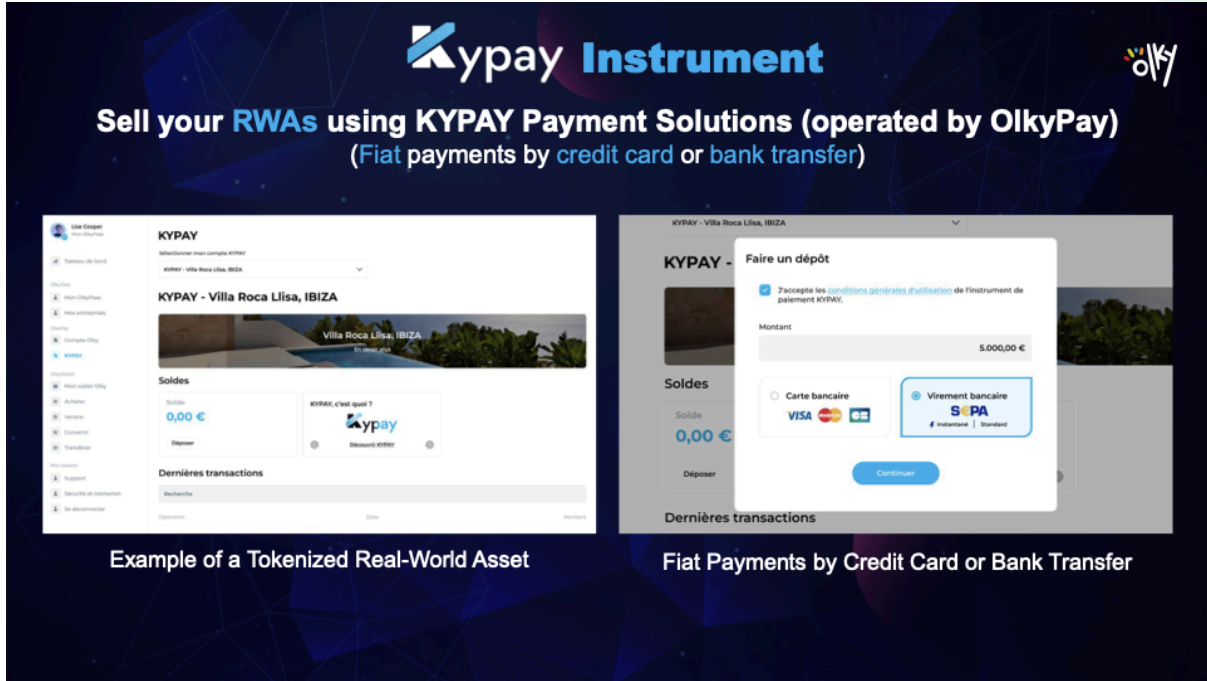
The LetzOlky platform grants access to the various stages of any tokenization process:

- KYC : identifying investors and authorising the purchase of tokens.
- Tokenization : creating tokens (ERC mint), providing IT facilities for transferring tokens to investors.
- On-ramps & off-ramps : fiat-to-crypto and crypto-to-fiat services.
- Swap : purchasing transactions tracking.
- Token issuing and monitoring.
- Custody (under approval).
- Liquid markets : organising ICOs / STOs.
- Real-world assets : bridging tokenized RWA into the platform.



Example of a tokenized real-world asset: KYPAY

Sell your RWAs using KYPAY payment solutions, operated by OlkyPay. The instrument supports fiat payments by credit card or bank transfer.



The image displays two screenshots of the KYPAY Instrument interface, which is operated by OlkyPay. The top banner reads "Kypay Instrument" and "Sell your RWAs using KYPAY Payment Solutions (operated by OlkyPay) (Fiat payments by credit card or bank transfer)".

The left screenshot shows a user's account page for "KYPAY - Villa Roca Llísa, IBIZA". It includes a balance of 0,00 €, a deposit button, and a section for "Dernières transactions".

The right screenshot shows a "Faire un dépôt" (Make a deposit) modal. It allows users to deposit 5,000,00 € using either a "Carte bancaire" (credit card) or a "Virement bancaire" (bank transfer) via SEPA. The modal also includes a "Continuer" (Continue) button.

Example of a Tokenized Real-World Asset

Fiat Payments by Credit Card or Bank Transfer

KYPAY payment instrument flow

The payment instrument secures both the buyer and the seller:

- Both the buyer and the seller of goods or services must obtain an OlkyPass KYC passport and accept KYPAY's terms and conditions.
- The buyer makes a deposit in EUR (by credit card or SCT-IP) via the payment page.
- The seller has visualisation of the deposit.
- The seller delivers the goods or services.
- OlkyPay validates and completes the transaction if conditions are met, executing a SEPA transfer in EUR to the seller's account.

Source: LetzToken : Procédure KYC-AML, Version 2.1, 07/04/2026. This document is a textual export of the source presentation; visual screenshots and flow diagrams (slides 6–14 and slides 20–21 of the original deck) are not reproduced and should be consulted in the original PowerPoint file.

