

# ROC TOKEN WHITELISTING POLICY

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**Rocksolid Estate AG**, 593266a  
Opernring 1/R/345, 1010 Vienna  
(hereinafter "**Rocksolid**" or "**Issuer**")

Whitelisting policy on ROC token transfer transferability measures

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28<sup>th</sup> Aug 2025

## 1. Preamble

- (A) General Meeting of Shareholders of Rocksolid Estate AG adopted a resolution on 24 May 2023 to issue up to 100,000,000.00 Profit Participation Rights, ISIN: AT0000A34CX2, ticker: "ROC", represented in tokenised form with a nominal value of EUR 0.01 each. The essential elements, characteristics, material rights and obligations attached to the indicated "ROC" Profit Participation Rights are set forth in more detail in the document "Terms and Conditions of the ROC Participation Rights" (the "ROC" Participation rights hereinafter referred to as the "**ROC Tokens**").
- (B) terms and Conditions of the ROC Participation Rights provide in § 1 (6) that the Participation Rights (represented in ROC Tokens) may be assigned only to third parties who have successfully completed a whitelisting process satisfactory to the Issuer. Assignment may be carried out by transferring the Token to a whitelisted address on the eCredits, Avalanche or other blockchain, designated by the Issuer. The Issuer will deem an assignment as effective once the transfer has been confirmed by 12 blocks after the block that records the transfer.
- (C) This Whitelisting Policy (the "**Whitelisting Policy**") on ROC token transfer transferability measures — which have been adopted by shareholder resolution dated 28th Aug 2025]—are intended complement the Terms and Conditions of the ROC Participation Rights by outlining the procedures and requirements for the identification and authorization of individuals and legal entities (hereinafter collectively referred to as "**Transferees**") to freely transfer ROC Tokens issued by the Rocksolid Estate AG . The primary objective of this policy is to ensure that Transferees meet a level of identification equivalent to that typically required when entering into commercial contracts, thereby promoting compliance with applicable laws and regulations while facilitating the secure and efficient transfer of ROC Tokens.

## 2. Identification standard

- 2.1. The Whitelisting Process adheres to an identification standard that is at least as rigorous as that required for identifying parties when entering into commercial contracts. This includes verification of legal identity, contact information, and adherence to relevant anti-money laundering (AML) and know-your-customer (KYC) regulations. The baseline level of identification involves the collection and verification of the following:
  - a) For an investor who is a natural person: A copy of a valid, government-issued photographic identification (e.g., a passport or national identity card), recent proof of residential address (e.g., a utility bill or bank statement), and potentially a tax identification number.
  - b) For an investor that is a legal entity: Constitutional documents (e.g., articles of association or bylaws), a recent excerpt from the relevant commercial or company register, and sufficient documentation to identify its legal representatives and Ultimate Beneficial Owners (UBOs).

## 3. Authorized entities

- 3.1 The Issuer may designate authorized entities or agents to perform identification and whitelisting procedures on its behalf. Such entities must meet stringent due diligence and regulatory compliance standards.

#### **4. Documentation**

- 4.1. Transferees are required to submit comprehensive documentation to support their identification, including, but not limited to, government-issued identification documents, business registration certificates, and any other pertinent legal documentation as required by applicable laws and regulations.

#### **5. Verification**

- 5.1. The Whitelisting Process includes a thorough verification of the documentation provided by Transferees to ensure the accuracy and authenticity of the submitted information.

#### **6. Record keeping**

- 6.1. The Issuer maintains detailed records of the Whitelisting Process, including all documentation and verification records, in compliance with legal and regulatory requirements.

#### **7. Access Control**

- 7.1. Robust access controls and security measures are in place to protect the confidentiality and integrity of information obtained during the Whitelisting Process.

#### **8. Ongoing Monitoring**

- 8.1. The Issuer may implement ongoing monitoring measures to ensure that Transferees continue to meet the identification standards throughout their ownership of the ROC Tokens.

#### **9. Transfer process**

- 9.1. ROC Tokens, representing ROC Participation Rights issued by the Issuer, may be transferred among whitelisted Transferees via blockchain transactions. These blockchain transactions shall adhere to the protocols and standards specified by the Issuer and comply with all relevant legal and regulatory requirements.

#### **10. Transferee Responsibilities**

- 10.1. Transferees are responsible for promptly notifying the Issuer of any changes to their identification information or status that may affect their eligibility under the Whitelisting Process.

#### **11. Final provisions**

- 11.1. This Whitelisting Policy is an integral component of the Issuer's ROC Token transfer framework. It is designed to promote transparency, security, and compliance with applicable legal and regulatory requirements while facilitating the efficient transfer of ROC Tokens among authorized Transferees. The Issuer is committed to upholding the highest standards of due diligence and regulatory compliance in its Whitelisting Process.

**Rocksolid Estate AG**