

ATLAS LAB FZE

**Website Disclosure
Guidelines**

TO VIRTUAL ASSETS REGULATORY AUTHORITY

Website Disclosure

June 2026

Purpose of This Guide

This document sets out the mandatory website disclosure requirements that Atlas AI Labs FZE must publish on its corporate website in connection with its Virtual Asset Issuance (Category 1) licence from the Virtual Assets Regulatory Authority (VARA).

For each requirement, this guide specifies:

- what content must appear on the website;
- where placeholders remain to be completed by the client; and
- which supporting policies or documents must be linked or uploaded.

The underlying policies referenced throughout this guide have been separately prepared and will be provided to you for upload. You do not need to reproduce the content of those policies on the website — a brief description and a link or downloadable PDF for each is sufficient.

Machine-Readable Format Requirement (VARA Company Rulebook — Rule II.D.2): All disclosures must be published in a machine-readable format. This means content must be presented as live, selectable HTML text — not as scanned images or image-only PDFs. Linked policy documents must be text-searchable PDFs. Please ensure your web developer is aware of this requirement before the website goes live.

Important — items marked [TO BE COMPLETED] require input before the website can go live.

0. Website URL and Go-Live Date

Website URL	[TO BE COMPLETED — insert the Atlas AI Labs FZE website URL]
Planned Go-Live Date	[TO BE COMPLETED — insert the planned launch date]

1. Licence Details and Authorised VA Activities

Display the following regulatory information on your website — a dedicated “Regulatory Information” or “About Us” page is suitable:

Legal Name	Atlas AI Labs FZE
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Place of Incorporation	Dubai, United Arab Emirates
Regulator	Virtual Assets Regulatory Authority (VARA)
VARA Licence Number	<i>[TO BE COMPLETED — insert upon licence issuance]</i>
Licence Validity Period	<i>[TO BE COMPLETED — insert issue date and expiry date]</i>
Authorised VA Activities	VA Issuance (Category 1)
Registered Office Address	23.01-EO22, Sheikh Rashid Tower, Dubai, UAE

REQUIRED ON WEBSITE: Include a hyperlink to the VARA Public Register: <https://www.vara.ae/en/licenses-and-register/public-register/> with the text: "The current status of Atlas AI Labs FZE's Licence can be verified via the VARA Public Register."

2. Responsible Individuals

Publish the names and roles of VARA-approved Responsible Individuals. This must be kept up to date at all times:

Name	Role
Reza Bundy	Chief Executive Officer
Alex Chehade	Chief Compliance Officer

3. Virtual Asset Standards

Publish a brief description on the website confirming that Atlas AI Labs FZE has adopted documented VA Standards setting out the minimum criteria a Virtual Asset must meet before issuance, and that the full document has been approved by VARA.

REQUIRED ON WEBSITE: Upload the VA Standards document (PDF) and link to it. The document will be provided to you separately.

4. Risk Disclosures (Market Conduct Rulebook — Rule V.B.1 & Issuance Rulebook — Rule III.B)

VARA requires Atlas AI Labs FZE to publish two categories of risk disclosure on its website. The general VA risks below (R1–R13) must appear sitewide — on the homepage and all

product pages — in line with Market Conduct Rulebook Rule V.B.1. The USAF+ token-specific risks that follow must appear on the USAF+ issuance page in line with Issuance Rulebook Rule III.B. Both are included in the single Risk Disclosure Statement that will be provided to you for upload.

Part A — General VA Risk Disclosure (sitewide): The following risk categories reflect the Atlas AI Labs FZE risk register and must be addressed in the published Risk Disclosure Statement:

Ref	Risk Category	Description to be published
R1	Market & Volatility Risk	Virtual asset trading is volatile, with prices changing rapidly and past performance not guaranteeing future returns. Investments can both increase and decrease in value, and there is a risk of not recovering the amount invested.
R2	Liquidity Risk	Virtual assets may have limited liquidity, making it challenging to sell or exit positions, especially during times of rapid price movements.
R3	Availability Risk	There is no guarantee that Atlas AI Labs FZE services will be available at all times. Unplanned outages or network congestion may prevent buying, selling or transferring virtual assets.
R4	Fees & Charges Risk	Users should be aware of all costs and charges associated with Atlas AI Labs FZE services, as these impact investment returns.
R5	Third Party Risk	Third parties including payment providers, custodians and banking partners are involved in the provision of services. You may be subject to the terms of these third parties, and Atlas AI Labs FZE may not be responsible for any loss they cause.
R6	Security Risk	Atlas AI Labs FZE cannot eliminate all security risks. Transactions in virtual assets may be irreversible, and losses due to fraud may not be recoverable.
R7	Virtual Asset Technology Risk	Virtual assets have intrinsic risks including faults, hacks and protocol failures. Transactions may be irreversible and technological developments can lead to asset obsolescence.
R8	Monitoring Risk	Virtual asset markets operate 24/7 and price changes can occur at any time, including outside of normal business hours.
R9	Communication Risk	Electronic communications can fail, be delayed or may not be secure, potentially affecting the intended communication.
R10	Volatility Risk	Virtual asset price fluctuations can impact gains and losses significantly and unexpectedly.
R11	Legal & Regulatory Risk	Changes in laws and regulations can significantly affect the value of virtual assets, with this risk varying across jurisdictions.

Ref	Risk Category	Description to be published
R12	Operational Risk	Risks relating to virtual asset issuance and token distribution, including process failures, reconciliation errors and record-keeping lapses.
R13	Smart Contract Risk	Smart contracts may contain coding errors, vulnerabilities or unintended logic that could lead to malfunction, unauthorised transactions or exploitation. Once deployed, smart contracts are typically immutable.

Part B — USAF+ Token-Specific Risk Disclosure (issuance page only): The following risks are specific to the USAF+ token and must appear on the USAF+ issuance page in addition to the general disclosure above.

Risk Area	Disclosure Required
Market & Volatility	USAF+ is linked to the Atlas America Fund (USAF) ETF. The value of USAF+ is subject to fluctuations in the underlying ETF, which comprises U.S. Treasuries, gold, REITs and commodities. Past performance of the ETF does not guarantee future returns.
Reserve Asset Risk	The USAF+ token is fully backed by ETF units held in custody with BNY Mellon. Changes in the value, composition or availability of the underlying reserve assets may affect the redemption value of USAF+.
Custody & Operational Risk	USAF+ tokens are held in custody via Fireblocks MPC infrastructure. Risks include key compromise, access control failure, system unavailability and business continuity events affecting Fireblocks or BNY Mellon.
Smart Contract Risk	USAF+ is issued on Ethereum Mainnet, Solana, Aptos and Stellar. Smart contract vulnerabilities, protocol failures or unauthorised token minting or transfers could affect token integrity and investor value.
Redemption & Liquidity Risk	Redemptions are processed on a T+2 to T+5 business day basis, subject to compliance checks and availability of underlying liquidity. In stressed market conditions, redemption timelines may be extended.
Regulatory Risk	USAF+ is issued under a VARA Issuance (Category 1) licence. Changes to the applicable regulatory framework in the UAE or other relevant jurisdictions may affect the issuance, transferability or redemption rights of USAF+.
Third Party & Counterparty Risk	The USAF+ ecosystem relies on BNY Mellon (ETF custody), Fireblocks (MPC custody), Securitize LLC (technology), and VARA-licensed broker-dealers for distribution. Failure of any key third party could disrupt issuance, custody or redemption operations.
Distribution Risk	USAF+ is distributed through authorised broker-dealers acting as agency intermediaries. Investors are subject to the eligibility criteria and terms of the relevant broker-dealer through which they access USAF+.

5. VA Issuance Disclosures

The following disclosures must be published on the product or issuance page of the website in respect of the USAF+ token.

5.1 Virtual Asset Issued

Token Name	USAF+
Token Type	Asset-Referenced Virtual Asset
Backing Asset	Atlas America Fund (USAF) ETF — comprising U.S. Treasuries, gold, REITs and commodities

5.2 White Paper / Offering Documentation

The white paper for the USAF+ token must be published in the form reviewed by VARA.

REQUIRED ON WEBSITE: Upload the White Paper (PDF) and insert the link once available. This has not yet been approved by VARA.

5.3 Use of Proceeds and Issuance Terms

A summary of the key issuance terms must be published, covering: intended use of proceeds; any caps, lock-ups or vesting arrangements; and categories of eligible participants.

REQUIRED ON WEBSITE: [TO BE COMPLETED — provide a summary of key USAF+ issuance terms for publication.]

5.4 Eligibility and Jurisdictional Restrictions

Publish the following statement on the issuance page:

Participation in the USAF+ issuance is subject to eligibility criteria including identity verification, sanctions screening and, where applicable, investor classification. UAE clients may access only those services and products approved by VARA. Eligibility criteria and any jurisdictional restrictions are set out in the offering documentation.

5.5 Regulatory Approval Status

REQUIRED ON WEBSITE: [TO BE COMPLETED — insert reference to VARA approval or no-objection confirmation for the USAF+ issuance once received.]

5.6 Senior Management and Board — Past Convictions

Publish the following statement on the website:

Atlas AI Labs FZE confirms that, to the best of its knowledge, no member of its Senior Management or Board has been the subject of any material past conviction or prosecution by the courts of the UAE or any other jurisdiction that has not been disclosed to VARA as part of the Fit and Proper Person assessment process.

6. Complaints Handling

Publish a Complaints Handling summary including the contact channels through which clients can submit a complaint and the following headline timeframes:

- Acknowledgement within 1 week of receipt;
- Final response and resolution within 4 weeks; and
- Extended cases resolved within 8 weeks, with a written update provided at the 4-week mark.

REQUIRED ON WEBSITE: Complaints inquiry email address - complaints@atlasailabs.ae

REQUIRED ON WEBSITE: Upload the Complaints Handling Policy (PDF) and link to it. The policy will be provided to you separately.

7. Anti-Bribery and Corruption

Publish a brief Anti-Bribery and Corruption statement confirming the Company's zero-tolerance approach, that gifts and hospitality are permitted only where modest and declared, and that any ABC concern may be reported to the Compliance Officer.

REQUIRED ON WEBSITE: Upload the Anti-Bribery and Corruption Policy (PDF) and link to it. The policy has not yet been approved by VARA.

8. Data Privacy

Publish a Data Privacy notice confirming that Atlas AI Labs FZE collects and processes personal data in accordance with the UAE Personal Data Protection Law (Federal Decree-

Law No. 45 of 2021) and the VARA Technology and Information Rulebook, and directing users to the full Data Privacy Policy.

REQUIRED ON WEBSITE: Upload the Data Privacy Policy (PDF) and link to it. The policy will be provided to you separately.

9. Terms and Conditions

A Terms & Conditions page must be accessible from the website footer. The Terms & Conditions document will be provided to you separately. It must cover: the nature of the website (general information only, not investment advice); eligibility to use the website; client onboarding requirements; intellectual property and trademarks; data privacy and cookies; disclaimers and limitation of liability; and governing law (Emirate of Dubai and UAE federal law).

REQUIRED ON WEBSITE: [TO BE COMPLETED — insert the website URL throughout the Terms & Conditions before publication.] – This policy has not been approved by VARA yet.