

TRANSAK KYB COMPLIANCE RESPONSE

Kairos 777 Inc. -- February 27, 2026

Kairos 777 Inc.

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To: Transak Compliance Team
 From: Mario Isaac, Founder & Director -- Kairos 777 Inc.
 Date: February 27, 2026
 Re: KYB Review -- Supplemental Compliance Documentation

Dear Transak Team,

Thank you for your thorough review. We are committed to full transparency and regulatory compliance. Below we address each area of inquiry with detailed supporting information.

1. Token Issuance & Presale Confirmation

1.1 Minting Upon Receipt of Funds

KAIROS tokens are NOT newly minted upon receipt of funds processed via Transak. When a user purchases KAIROS through Transak, they receive tokens from the existing circulating supply held in the Kairos 777 Inc. treasury wallet (0xCee44904A6aA94dEa28754373887E07D4B6f4968). The process operates identically to purchasing any existing stablecoin (e.g., USDT or USDC) through an on-ramp provider.

```
User pays fiat (via Transak)
-> Transak processes payment
-> Kairos 777 transfers KAIROS from treasury to user wallet
-> No new tokens are minted in this transaction
```

New tokens are only minted under strictly controlled circumstances when USD reserves demonstrably increase, entirely independent of the Transak integration.

1.2 Presale, ICO, Private Sale Confirmation

We confirm the following:

- * No presale of KAIROS tokens has occurred or is planned.
- * No ICO (Initial Coin Offering) has been conducted or is planned.
- * No private sale to investors has occurred or is planned.
- * No treasury funding round through token sales has been conducted.
- * No primary issuance event has taken place beyond the genesis deployment.

KAIROS was deployed with a fixed initial supply of 10,000,000,000 tokens minted to the Kairos 777 Inc. admin wallet at the genesis transaction. This is a utility stablecoin, not an investment vehicle.

1.3 Transak Use Confirmation

We confirm that Transak will NOT be used to facilitate:

- * Primary token issuance
- * Presale distribution
- * Treasury capital formation
- * Any form of securities offering

Transak will serve exclusively as a fiat on-ramp, enabling users to acquire KAIROS tokens from existing circulating supply at the fixed 1 KAIROS = 1 USD rate -- functionally identical to purchasing USDT or USDC through any on-ramp service.

1.4 Whitepaper & Tokenomics

The full whitepaper and tokenomics documentation are available at:

- * Whitepaper (HTML): <https://kairos-777.com/whitepaper.html>
- * Verified Smart Contract: <https://bscscan.com/address/0x14D41707269c7D8b8DFa5095b38824a46dA05da3#code>

Supply Structure:

Parameter	Value
Token Name	Kairos Coin
Symbol	KAIROS
Standard	BEP-20 (ERC-20) + ERC-2612 Permit
Decimals	18
Initial Supply	10,000,000,000 (10 Billion)
Max Supply	Flexible (mint/burn for 1:1 peg)
Peg	1 KAIROS = 1 USD
Transfer Fee	8 basis points (0.08%)

Distribution Model:

Allocation	Percentage	Purpose
Platform Liquidity	40%	Trading platform liquidity
Exchange Liquidity	20%	DEX pools and CEX listings
Ecosystem Development	15%	Wallet integrations, partnerships
Team & Operations	10%	Operational expenses
Community & Rewards	10%	User acquisition, incentives
Strategic Reserve	5%	Emergency fund, future needs

2. Minting Mechanism & Fund Flow Structure

2.1 Automated Mint Engine (Independent of Transak)

The minting mechanism is a smart contract function (mint()) that can only be called by the contract owner address.

```
function mint(address to, uint256 amount)
    external onlyOwner whenNotPaused nonReentrant
```

Key controls:

- * Caller restriction: Only the contract owner can invoke minting.
- * Per-transaction cap: Configurable minting limit per transaction.

- * Pause mechanism: Minting can be halted via the pause() function.
- * On-chain transparency: Every mint emits a public Mint event.
- * Cumulative tracking: totalMinted variable tracks all tokens ever minted.

2.2 Fund Flow -- Transak Purchases

Transak fiat payments are NOT routed to a Kairos-controlled wallet prior to minting.

1. User initiates purchase via Transak widget
2. Transak collects fiat payment directly (card/bank)
3. Transak notifies Kairos 777 backend (webhook)
4. Kairos 777 transfers KAIROS from treasury to user wallet
5. Transaction is recorded on-chain (BNB Smart Chain)

- * No fiat funds from Transak touch a Kairos-controlled wallet.
- * No minting occurs as part of the Transak purchase flow.

2.3 Minting Authority

Parameter	Value
Owner Address	0xCee44904A6aA94...D4B6f4968
Controlled By	Mario Isaac (Founder)
Multi-sig	Planned for Phase 2 (3-of-5)
Minting Events	All publicly visible on BscScan

Governance Evolution Roadmap:

- * Current: Single-owner control (Mario Isaac / Kairos 777 Inc.)
- * Phase 2: Multi-signature wallet (3-of-5 signers required)
- * Phase 3: Timelock on critical operations (48-hour delay)
- * Phase 4: Community governance via DAO voting

3. Regulatory & Licensing Position

3.1 Money Transmitter Licenses (MTLs)

No U.S. state-level Money Transmitter Licenses have been obtained at this time. Kairos 777 Inc. is in the process of evaluating the regulatory requirements applicable to our operational model with legal counsel.

3.2 Regulatory Analysis

Our operational model is structured such that Kairos 777 Inc. does not directly transmit money or act as a money services business (MSB) in the context of the Transak integration:

- * Transak acts as the payment processor and fiat on-ramp provider. Transak holds the relevant licenses and regulatory authorizations for fiat-to-crypto conversion.
- * KAIROS is a utility token within the Kairos ecosystem, functioning as the native currency for the Kairos Trade platform and Kairos Wallet.
- * Token transfer (not money transmission): The Transak purchase flow involves Kairos 777 Inc. transferring existing

digital tokens from its treasury to a user blockchain address.

- * Comparable model: This structure is analogous to other on-ramp integrations where users purchase existing stablecoins through licensed payment processors.

Note: Kairos 777 Inc. is actively engaging legal counsel to obtain a formal legal opinion on our regulatory positioning. We will provide a formal legal memorandum upon completion.

3.3 Compliance Measures Already in Place

Measure	Implementation
Address Blacklisting	On-chain blacklist system
Emergency Pause	Circuit breaker to halt transfers
On-chain Audit Trail	All admin actions emit events
Verified Source Code	Full contract verified on BscScan
KYC Integration	Via Transak KYC process
Transaction Monitoring	Backend monitoring of all KAIROS activity

4. Corporate & Shareholder Structure

4.1 Shareholding Structure

Shareholder	Ownership	Role
Mario Isaac	100%	Founder, Director, UBO

4.2 Ultimate Beneficial Ownership (UBO)

Mario Isaac is the sole Ultimate Beneficial Owner (UBO) of Kairos 777 Inc. with 100% ownership and full operational control.

UBO Field	Value
Full Name	Mario Isaac
Role	Founder & Director
Ownership	100%
Control	Full operational and financial control
Entity	Kairos 777 Inc.

4.3 External Investors & Token Holders

We confirm:

- * No external investors hold equity in Kairos 777 Inc.
- * No venture capital, angel investment, or institutional funding has been received.
- * No token holders have equity claims, governance rights, or any ownership interest.
- * No treasury allocations exist beyond those disclosed in the tokenomics.

- * All token supply (10B KAIROS) is held in the admin wallet controlled by Mario Isaac.

5. AML / CTF Framework

5.1 AML/CTF Policy

A comprehensive AML/CTF (Anti-Money Laundering / Counter-Terrorism Financing) Policy has been prepared and is attached separately as AML_CTF_POLICY.pdf.

5.2 Policy Highlights

Area	Implementation
Transaction Monitoring	All minting, burning, large transfers monitored
Suspicious Activity	Automated alerts for \$10,000+ transactions
Blacklisting	On-chain address blacklisting (OFAC compliant)
KYC Delegation	Transak licensed compliance process
Record Keeping	Transaction logs maintained 5+ years
Reporting	SARs filed as required by law

5.3 On-Chain Compliance Tools

```
// Blacklist an address (sanctions/fraud compliance)
function blacklist(address account) external onlyOwner

// Remove from blacklist
function unBlacklist(address account) external onlyOwner

// Emergency halt of all transfers
function pause() external onlyOwner

// Resume operations
function unpause() external onlyOwner
```

Attached Documents

- * WHITEPAPER.md -- Full whitepaper with tokenomics and technical architecture
- * AML_CTF_POLICY.pdf -- Complete AML/CTF Policy
- * Smart Contract Source -- Verified on BscScan

Contact

Field	Value
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Title	Founder & Director

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We are fully committed to maintaining the highest standards of compliance and transparency. Please do not hesitate to contact us if any further documentation or clarification is required.

Respectfully,

Mario Isaac

Founder & Director

Kairos 777 Inc.

"In God We Trust"