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January 13, 2026

The President,
TC Advantage Traders, Ltd.
7A West Drive, 2nd Floor, Nervee Building
Freeport, Grand Bahamas, Bahamas

Re: TC Advantage Traders, Ltd. 5% Secured Medium Term Notes – Legal Opinion on Validity, Ownership, Collateral Use, and Integration into OPTKAS1 XRPL Reserve & Oracle System

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Scope of Engagement

I write in reference to the above captioned and hereby advise that we act as International Counsel for **OPTKAS1-MAIN (hereinafter referred to as "OPTKAS1" or SPV)**, a Wyoming special purpose vehicle (the "SPV"), and, solely with respect to the description of its technology and infrastructure, to OPTKAS1 [Holdings/Markets] Ltd. ("Optima Global"), in connection with:

- The SPV's acquisition of a specified tranche (the "Tranche") of 5% Secured Medium Term Notes (the "Notes") issued by TC Advantage Traders, Ltd. ("TC Advantage" or the "Issuer"); and

- The proposed use of the Tranche as collateral for one or more funding arrangements, which may include secured credit facilities, repo-style transactions, warehouse credit lines, or structured note issuances.

The Tranche, once validly issued, held, and properly pledged, is intended to serve as recognized collateral supporting the SPV's credit or funding obligations. Related reserve assets will be represented within the Optima XRPL System, maintained by OPTKAS1, which employs a reserve registry, oracle integration, and proof-of-reserves (PoR) mechanisms designed to ensure transparent, auditable treatment of collateral.

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This opinion is rendered at the request of OPTKAS1 and the SPV for the benefit of **[Lender, Funding and/or Holder of this collateral** **to be provided** (hereinafter referred to as the "Lender") in connection with evaluation of the Tranche as eligible collateral within the Optima XRPL System and related funding structures.

Please be advised that we do not act as counsel for TC Advantage or the Securities Transfer Corporation ("STC"), having resigned for the same from and since the **25th day of September A.D. 2025**.

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Documents and Information Reviewed

In rendering this opinion, we have examined originals or copies of the following (collectively, the "Transaction Documents"):

- The Private Placement Memorandum ("PPM") for TC Advantage 5% Secured Medium Term Notes, dated May 29, 2020, describing the USD 5 billion medium-term note program (Reg S / Rule 144A).

- Issuer's Security List / Position Report prepared by STC, identifying outstanding series and -- CUSIP/ISIN numbers, including:
  - CUSIP 87225HAB4 / ISIN US87225HAB42 (Rule 144A); and
  - CUSIP P9000TAA8 / ISIN BSP9000TAA83 (Reg S).

- Draft or executed Subscription / Assignment Agreement between [TC Advantage] and the SPV.

- Draft Transfer Agent Position Statement confirming SPV's beneficial ownership of the Tranche.

- Draft Pledge and Security Agreement between the SPV and the Lender (the "Security Agreement").

- Organizational documents and resolutions authorizing the SPV's acquisition and pledge of the Tranche.

- Technical documentation describing the Optima XRPL System, including node operations, reserve registry architecture, oracle feeds, haircut logic, and internal liquidity controls.

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We have also relied on Officer certificates from the SPV and OPTKAS1 and on factual assumptions set forth below.

Assumptions

For purposes of this opinion, we have assumed without independent verification that:

- All copies conform to authentic originals, signatures are genuine, and signatories had signatory capacity.

- TC Advantage is duly incorporated under the laws of the Commonwealth of the Bahamas and validly existing under its governing law and has duly issued the Notes under the PPM and program documentation.

- STC is duly authorized and its records accurately reflect the outstanding Notes.

- The Subscription Agreement, Security Agreement, and all related documents are or will be duly authorized, executed, and delivered by each party and constitute binding obligations.

- No prior liens or adverse claims exist on the Tranche other than those disclosed in writing to the Lender.

- All compliance requirements up to the writing of this opinion as it relates to the relevant securities law compliance (Reg S, Rule 144A, etc.) has been satisfied.

- All technical infrastructure operates as described, recognizing we do not opine on cybersecurity or software reliability.

This opinion is further subject to the qualifications stated below.

Opinions on Program Validity and Tranche Status

TC Advantage Medium Term Note Program

Based on the PPM and supporting materials, the Program authorizes issuance of up to USD 5 billion of secured medium-term notes, bearing a 5% annual coupon and maturing on or

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before May 31, 2030, subject to early redemption. The Notes forming the Tranche are secured obligations of TC Advantage under that Program.

We express no opinion on TC Advantage's financial condition or creditworthiness.

Existence and Outstanding Nature of the Tranche

Subject to receipt of a current STC holder statement, the series representing the Tranche is validly issued and outstanding under the Program, and the face amount agreed in the Subscription Agreement corresponds to authorized and outstanding principal amounts.

Ownership and Collateralization

Ownership by the SPV

Upon execution and delivery of the Subscription Agreement, payment of consideration, and issuance of an STC position statement identifying the SPV as beneficial owner, the SPV acquires valid and legally recognizable title to the Tranche, subject only to transfer restrictions in the PPM and applicable law. Between the SPV and the Lender, the STC statement and Transaction Documents constitute adequate evidence of ownership.

Security Interest in Favor of the Lender

Validity and Enforceability

The Security Agreement constitutes a legal, valid, and binding obligation of the SPV, enforceable in accordance with its terms, subject to (i) bankruptcy, insolvency, reorganization, moratorium, or similar laws affecting creditor rights generally, and (ii) general equity principles, including good faith and fair dealing.

Creation of Security Interest

The Security Agreement effectively grants the Lender a security interest in:
- The Tranche (the Notes);

- All payments of principal and interest thereon; and

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- All proceeds of any disposition of the Tranche.

Perfection and Priority

Upon proper UCC filings in the SPV's jurisdiction and/or establishment of appropriate custodial or control arrangements with STC or another securities intermediary, the Lender will hold a first-priority perfected security interest in the Tranche, subject only to:

- Permitted liens expressly authorized in the Security Agreement; and

- Liens arising by operation of law that cannot be contractually subordinated.

Recommended Due Diligence

We recommend that the Lender:

- Obtain current UCC search results confirming the absence of prior filings against the SPV; and

- Request any necessary lien subordination or payoff letters from existing secured creditors.

OPTKAS1 XRPL Reserve, Oracle, and Proof-of-Reserves Framework

Description of the Optima XRPL System

Based on the technical materials reviewed and interview of divers expert on the subject mastters:

XRPL Node Infrastructure – OPTKAS1 maintains a fleet of full-history and validating XRPL nodes to preserve an independent, verifiable ledger view and serve as the primary connection for on-ledger positions, with deterministic data feeds for internal and external dashboards.

Reserve Registry and Collateral Classification – OPTKAS1 maintains an internal Reserve Registry classifying assets such as **CASH, FIAT_BALANCE, CREDIT_MTN** (including the Tranche), **GOLD/HARD ASSET, and RWA_POOL**. Each entry identifies the owner,

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instrument identifiers, face and effective (discounted) value, LTV limits, and documentary references (often via IPFS CIDs).

Oracle and Proof-of-Reserves Integration – The System integrates with institutional oracles (e.g., Chainlink) to publish on-chain attestations of aggregate reserve values and reconcile off-chain data including but not limited to **bank statements, STC reports, audits** with on-chain reserve tables. Data feeds are cryptographically signed and tamper-evident but remain subject to normal operational and cyber risk.

LTV, Haircut, and Capacity Logic – Haircuts of approximately 70–90% (therefore permitting 10–30% capacity recognition) apply to **CREDIT_MTN** assets such as the Tranche. Aggregate borrowings or issuances are limited by these adjusted capacities and by internal credit approvals.

Legal Characterization of the Oracle and Proof-of-Reserves Framework

From a legal and compliance perspective, the Optima XRPL System—including XRPL node management, the Reserve Registry, and oracle-based data integration—is reasonably structured to:

- Provide auditable evidence of reserve composition and internal limits; and

- Enable third-party verification via oracle data, IPFS-referenced records, and auditor/Lender access to raw documentation and ledger data.

Nothing in the PPM, STC materials, or applicable law prohibits:

- The SPV or OPTKAS1 from referencing the Tranche as collateral within the Reserve Registry;

- The use of Institutional oracles to disseminate reserve or collateral data; or

- Operation of a private or semi-public proof-of-reserves reporting system, provided the reports are accurate, not misleading, and compliant with applicable securities and disclosure laws.

On-chain representations (XRPL IOUs, tokens, or vault markers) linked to the Tranche—when used solely for internal accounting or signaling and not marketed as participations in the Notes—are consistent with the structure of a secured collateral management and reserve system.

Determination of whether any digital instrument constitutes a "security" under U.S. or international law is a fact-specific question beyond the scope of this opinion. Nothing in the System, as described, appears inconsistent with a compliant collateral-backed funding framework.

Funding, LTV Facilities, and Collateral Utilization of the Tranche

Based on the foregoing and subject to the Lender's credit, risk, and regulatory assessments, the Tranche (validly issued, held by the SPV, and pledged under the Security Agreement) is legally eligible to secure:

- Secured revolving or term facilities;

- Repo or reverse-repo transactions;

- Warehouse credit lines;

- Structured note or bilateral funding arrangements; and

- Internal stablecoin, IOU, or credit issuances by OPTKAS1 or affiliates, subject to applicable law.

Use of Discounted LTV limits (e.g., 10–30% of face value) constitutes a commercially reasonable and legally unobjectionable risk-mitigation mechanism in institutional contexts.

Together, (i) a perfected first-priority lien in the Tranche, (ii) a documented Reserve Registry, and (iii) an oracle-anchored proof-of-reserves layer forms a coherent framework enabling the Lender to treat the Tranche as recognized collateral within its credit and capital models, subject to its own policies and prudential regulation.

This opinion does not guarantee:

- **The financial performance of TC Advantage Ltd.;**

- **The adequacy of applied haircuts or valuations; or**

- **Regulatory capital or accounting treatment outcomes.**

Such determinations remain the responsibility of the Lender and its regulators.

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Qualifications and Limitations

·   (a)Jurisdiction. This opinion is limited to the laws of the jurisdiction of issuance and/or where transaction(s) are performed as currently in effect. We express no opinion on any other law.

·   (b) No Opinion on Financial or Cyber Risk. We opine only on legal validity, not on credit quality, market value, or technical resilience of blockchain or oracle infrastructure.

·   (c) Securities Law Scope. We do not provide a conclusive determination on whether any future token or instrument constitutes a "security."

·   (d) Reliance on Facts. Our opinions rely on factual certificates and representations provided to us. We have not independently audited such information.

·   (e) No Updating Obligation. We assume no duty to advise of legal or factual changes after the date of this letter.

Reliance and Use

This opinion is furnished solely for the benefit of TC Advantage, Ltd. in connection with evaluation of the Tranche as collateral and its representation in the Optima XRPL System. It may be disclosed to regulators, auditors, or rating agencies in the ordinary course of oversight but may not otherwise be relied upon by any other person without our prior written consent.

Yours faithfully,

K. KNOWLES & CO.

Kendal Knowles

Counsel and Attorney at Law