

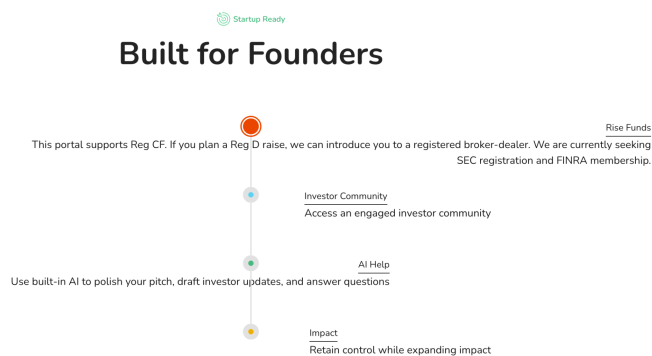
1. On “Companies” Page, section “Rise Funds”:

Remove:

This portal supports Reg CF. If you plan a Reg D raise, we can introduce you to a registered broker-dealer. We are currently seeking SEC registration and FINRA membership.

Replace:

THIS PORTAL OPERATES EXCLUSIVELY UNDER REGULATION CROWDFUNDING (REG CF) RULES. WE ARE NOT A BROKER-DEALER AND DO NOT CURRENTLY FACILITATE OFFERINGS CONDUCTED UNDER REGULATION D OR ANY OTHER EXEMPTIONS. IF YOU ARE INTERESTED IN PURSUING A REGULATION D RAISE, WE MAY PROVIDE GENERAL INFORMATION ABOUT THE PROCESS AND INTRODUCE YOU TO INDEPENDENT, REGISTERED BROKER-DEALERS WHO CAN ASSIST YOU. KURUDY IS IN THE PROCESS OF APPLYING FOR SEC REGISTRATION AND FINRA MEMBERSHIP AS A FUNDING PORTAL. UNTIL APPROVAL IS GRANTED, ALL ACTIVITIES ON THIS SITE WILL REMAIN LIMITED TO THOSE PERMITTED UNDER REG CF.



2. “Terms” page, section 13, “B. Fees Charged to Investors”, Update to show the following:

“Kurudy does not charge investors any fees to create an account, access platform content, or participate in offerings.

- A third-party payment processor may charge a small, non-refundable fee (typically 2–3%) directly to investors at the time of investment. This fee is set by the processor and not retained by Kurudy.*
- Certain actions, such as security transfers or early redemption requests, may involve third-party service provider fees. These will be disclosed in advance and are not retained by Kurudy.*

Kurudy’s compensation is derived solely from issuer fees, as permitted under Regulation Crowdfunding.

3. Remove mention of Reg D on the “Investors” page (screenshot below)

Power Moves

Why Kurudy?

Empower US

Track your investments

AI Insights

Secure Offerings

Built to align with U.S. Regulation CF and Regulation D

Secure Offerings

How It Works

Your Investment Journey,
Simplified

4. Please add the following text to the blue footer banner.
“Kurudy is not a FINRA member or a registered broker-dealer.”

As a beginner, I could clearly see the properties and track the transparency in pricing and this gave me full confidence to invest.”

investment opportunities on this platform. The listings are detailed, and I love the clean interface.”

approachable for me as a beginner. I could clearly compare different properties and track performance. The transparency in pricing and raised amounts gave me full confidence to invest.”

investment opportunities on this platform. The listings are detailed, and I love the clean interface.”

Nothing on this site constitutes a solicitation to invest. All content is for informational purposes only and represents examples of potential upcoming investment opportunities.

Kurudy

Terms

Privacy

Disclosure

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5. This should say “Pending SEC and FINRA approval”


Take the Quiz

What type of investor are you?

Be investment ready as soon as we are - Pending SEC approval

Screenshot

6. Please remove the following text from the “Terms” page.



Jennifer Newton <jennifer.newton@startsmartcounsel.com>
to William, me, Genevieve < >
6:11 PM (18 minutes ago) ☆ ↶ ⋮

If unnecessary, it would help to remove this from your terms:

3. Subscription Tiers: Basic and Premium Access

A. Overview of Tiers

Kurudy offers two platform access levels designed to meet the needs of both casual and active investors:

· Basic Access (Free)
· View public investment listings
· Access summary-level issuer information
· Receive educational content and updates
· Participate in Reg CF offerings with standard tools
· Premium Access (Paid)
· Includes all Basic features, plus:
· All Reg CF campaigns are available equally; Premium Access does not provide preferential access—only advanced tools and education
· Advanced issuer analytics and financial disclosures
· Smart alerts, watchlists, and investor insights
· Priority onboarding and dedicated support
· Invitations to investor webinars and premium briefings

A full list of included features and service levels is available in Kurudy’s separate www.kurudy.com/Terms_Subscription.

B. Pricing & Payment Terms

· Premium Access is offered on a monthly or annual subscription basis.
· Prices may vary depending on promotional or institutional offers and are clearly disclosed at checkout.
· Subscriptions are billed via secure third-party processors.
· Plans renew automatically unless canceled before the next billing cycle.

C. Changes, Upgrades & Downgrades

· You may upgrade to Premium at any time through your account settings.
· Downgrades to Basic will take effect at the end of your current billing cycle; no partial refunds are given.
· You can cancel at any time, with continued access through the current billing period.

D. Updates to Subscription Terms

Kurudy may revise subscription pricing, features, or availability. Users will be notified in advance, and changes will apply only to future billing periods or new subscriptions. Kurudy may revise subscription pricing, features, or availability. Users will be notified in advance, and changes will apply only to future billing periods or new subscriptions.