

## **PARTNER RESPONSIBILITY DISCLOSURE**

Effective Date: 27 may 2026

This Partner Responsibility Disclosure explains the allocation of responsibilities between XELEVEN INC and independent third-party regulated service providers.

### **1. INFRASTRUCTURE ROLE**

XELEVEN operates as a technology infrastructure provider and orchestration layer connecting clients to independent regulated service providers.

XELEVEN does not directly provide regulated financial services.

### **2. ROLE OF REGULATED PROVIDERS**

Independent regulated providers may include:

- banks;
- electronic money institutions;
- payment service providers;
- card issuers;
- compliance providers;
- virtual asset service providers.

Such providers retain exclusive authority over:

- client onboarding;
- KYC/AML approval;
- sanctions screening;
- account issuance;
- payment processing;
- card issuance;
- transaction monitoring;
- account suspension;
- account closure.

### **3. CLIENT RELATIONSHIP**

Clients may be required to enter into direct legal relationships with regulated providers.

Regulated providers may impose:

- separate terms;
- separate fees;
- jurisdictional restrictions;
- compliance obligations.

#### **4. NO GUARANTEE**

XELEVEN does not guarantee:

- onboarding approval;
- account opening;
- provider acceptance;
- uninterrupted service;
- availability in all jurisdictions.

#### **5. COMPLIANCE RESPONSIBILITY**

Regulated providers remain independently responsible for:

- regulatory compliance;
- AML obligations;
- licensing requirements;
- sanctions compliance;
- transaction monitoring.

#### **6. LIMITATION OF ROLE**

XELEVEN's role is limited to:

- infrastructure access;
- software orchestration;
- technical integration;
- onboarding coordination;
- operational connectivity.

XELEVEN does not:

- hold client funds;
- transmit money;
- custody assets;
- issue financial products;
- provide regulated financial services.

#### **7. REGULATORY STATUS**

XELEVEN is not:

- a bank;
- an EMI;
- an MSB;
- a PSP;
- a VASP;
- a licensed financial institution.

All regulated services are performed exclusively by licensed third-party providers operating under their own regulatory authorizations.

