

REGULATORY DISCLAIMER

Effective Date: 27 may 2026

This Regulatory Disclaimer (“Disclaimer”) governs the use of the website, infrastructure, software, APIs, white-label solutions, integrations, and related services provided by XELEVEN INC (“XELEVEN”).

1. COMPANY STATUS

XELEVEN operates solely as a technology infrastructure provider, software provider, orchestration-layer operator, and integration coordinator.

XELEVEN is not:

- a bank;
- a credit institution;
- a payment system;
- an Electronic Money Institution (EMI);
- a Money Services Business (MSB);
- a money transmitter;
- a payment institution;
- a broker-dealer;
- an investment adviser;
- a custodial provider;
- a Virtual Asset Service Provider (VASP);
- a licensed financial institution.

2. NO REGULATED FINANCIAL SERVICES

XELEVEN does not directly provide:

- banking services;
- deposit-taking services;
- money transmission services;
- payment services;
- merchant acquiring;
- card issuing services;
- custodial services;
- investment services;
- brokerage services;
- cryptocurrency exchange services;
- regulated financial services.

3. INDEPENDENT LICENSED PROVIDERS

All regulated financial services referenced on the website or accessible through the XELEVEN infrastructure are provided exclusively by independent third-party licensed institutions, including:

- banks;
- Electronic Money Institutions;
- Payment Service Providers;
- card issuers;
- compliance providers;
- Virtual Asset Service Providers;
- regulated financial institutions.

Such institutions operate:

- under their own licenses;
- under their own regulatory supervision;
- in accordance with their own compliance policies and procedures.

4. ROLE OF XELEVEN

XELEVEN's role is strictly limited to:

- providing software;
- technology orchestration;
- API integrations;
- white-label infrastructure;
- technical connectivity;
- integration coordination;
- operational interoperability between systems.

XELEVEN does not:

- accept deposits;
- hold client funds;
- transmit money;
- control client assets;
- process payments on its own behalf;
- act as a financial intermediary.

5. NO GUARANTEES OR APPROVALS

Use of the XELEVEN infrastructure does not guarantee:

- bank account opening;
- onboarding approval;
- compliance approval;
- licensing approval;
- card issuance;
- service availability in specific jurisdictions.

All such decisions are made solely by independent licensed providers.

6. NO LEGAL OR FINANCIAL ADVICE

Nothing contained on the XELEVEN website constitutes:

- legal advice;
- financial advice;
- investment advice;
- an offer of financial services;
- solicitation of regulated financial products or services.

Users are solely responsible for obtaining independent legal, tax, regulatory, and compliance advice in relevant jurisdictions.

7. JURISDICTIONAL RESTRICTIONS

Certain services, integrations, and infrastructure solutions may not be available:

- in specific countries;
- for certain business categories;
- in sanctioned jurisdictions;
- for high-risk clients or industries.

XELEVEN reserves the right to restrict access to services at its sole discretion and in accordance with applicable laws, partner requirements, and compliance obligations.

8. SANCTIONS AND COMPLIANCE

XELEVEN maintains a compliance-oriented operational framework and may:

- conduct sanctions screening;
- request KYC/AML documentation;
- restrict access to services;
- refuse cooperation;
- cooperate with licensed compliance providers.

9. MODIFICATIONS

XELEVEN reserves the right to amend this Regulatory Disclaimer at any time without prior notice.

Continued use of the Services following publication of any amendments constitutes acceptance of the updated version.

10. CONTACT INFORMATION

For compliance and regulatory inquiries:

info@xeleven.io