72 WG SYS
Connecting Capital Worldwide

Terms & Policies

72 WG SYS LTD · Effective date: February 20, 2026 · Last updated: November 18, 2026

This document summarizes the policies under which 72 WG SYS LTD ("72 WG SYS", "we", "us") provides its services. The specific fees and conditions for each client are set out in that client's signed service agreement.

1. About 72 WG SYS

72 WG SYS LTD is a stable digital asset management and vaulting company that provides secure custody services for digital assets. We specialize in online and offline storage solutions to maximize security, while giving clients portfolio tracking and management through our secure platform.

Our mission: to provide institutional-grade security and professional management of stable digital assets while maintaining the highest standards of compliance, transparency, speed, price and customer service.

Core services

- Secure offline stable digital asset storage (cold storage vaulting)
- Portfolio tracking and management
- Transaction execution services
- Digital asset and stable digital asset trading and acquisition services
- Compliance and regulatory reporting

2. Anti-Money Laundering (AML) Policy

72 WG SYS LTD is a legal, ethical and transparent company. We take responsibility for ensuring that our assets and resources are not used for corruption, irregularities, money laundering or terrorism financing.

We do not accept money or assets that:

- Were received in exchange for criminal or unlawful acts, or whose origin is not explicit
- Were gained through criminal activity, or whose origin, location and disposition are not transparent
- Promote any unlawful activity
- Are connected to terrorism financing

To meet these commitments, 72 WG SYS LTD will:

- Identify all clients and verify their identity through robust KYB procedures

- Apply enhanced due diligence where clients seek anonymity or show unusual transaction patterns
- Maintain comprehensive records of all clients and transactions
- Monitor transactions for suspicious activity
- Report suspicious activity to the appropriate authorities as required by law

3. Know Your Business (KYB) Requirements

All business clients must complete the 72 WG SYS LTD KYB questionnaire and provide:

- Incorporation documents showing date and country of incorporation, registry code, corporate capital and company contact details
- Ownership structure documents showing shareholdings and controlling interests, with beneficial owners and directors clearly identified
- Passport or government-issued ID for account holders, board members and ultimate beneficial owners
- Regulatory licenses, if applicable to the business activities
- The latest audited annual report or financial statement
- Proof of transaction volume: the last 3 months of statements, and MCC codes if available

Enhanced due diligence applies to high-risk jurisdictions, politically exposed persons (PEPs), complex ownership structures, high-risk industries and clients requesting unusual anonymity.

4. Client Onboarding

- **Consultation:** we review the client's needs, assess service suitability and explain our services, fees and contract terms.
- **Verification:** the client completes the KYB questionnaire and AML forms; we verify all required parties and approve or decline the application.
- **Account creation:** after approval, the client creates an account on the 72 WG SYS LTD platform, sets up security (including two-factor authentication) and signs the service agreement.
- **Initial funding:** we provide secure wallet addresses, confirm receipt of funds, transfer them to offline storage and confirm successful vaulting.

5. Asset Custody and Security

- **Cold storage:** client assets are held in offline, air-gapped systems using multi-signature hardware wallets in secure, climate-controlled and fire-suppressed facilities, distributed across multiple locations.

- **Access controls:** any access to cold storage requires multi-person authorization.
- **Key management:** multi-signature wallets, private keys split using Shamir's Secret Sharing, keys generated with certified random number generators, regular key rotation and encrypted backups in separate locations.
- **Segregation:** client assets are kept separate from company assets, each client account is tracked individually, holdings are reconciled regularly and every asset movement has an independent audit trail.
- **Insurance:** stored digital assets are covered by insurance.

6. Transactions

- Purchase requests are submitted through our secure platform. Pricing is confirmed and must be approved by the client before execution through authorized trading channels.
- Portfolio rebalancing is only carried out with the client's approval.
- All transactions are monitored in real time, screened for suspicious activity and checked against sanctions lists and high-risk jurisdictions. High-value or unusual transactions are reviewed manually.

7. Withdrawals and Settlement

- Withdrawal requests are submitted through our secure platform and require identity verification and authorization.
- Applicable fees and any penalties under the client's contract are calculated, and the client confirms the final amount before processing.
- Emergency withdrawals require enhanced verification and senior management approval, may carry higher fees, and are processed within 24–48 hours.
- Settlement is available as a direct transfer of digital assets or stablecoins to the client's external wallet, or as a bank wire to a verified account.

8. Fees

All fees are disclosed and agreed upon in each client's service agreement before services begin. Depending on the agreement, they may include management, performance, transaction, deposit, withdrawal and inactivity fees.

Withdrawals before the end of a contract may be subject to early withdrawal penalties. These depend on the contract duration, service level, asset type and liquidity, and market conditions, as set out in the agreement.

Fees are calculated monthly based on the average daily balance, deducted automatically from the client's account balance, and reported in monthly statements and an annual reconciliation.

9. Supported Assets

Stablecoins: Tether (USDT).

Other digital assets: Bitcoin (BTC), Bitcoin Cash (BCH), Binance Coin (BNB), Cardano (ADA), Dash, Dogecoin (DOGE), EOS, Ethereum (ETH), Ethereum Classic (ETC), Litecoin (LTC), Monero (XMR), Ripple (XRP), Solana (SOL), Stellar (XLM), Tron (TRX), Vertcoin (VTC) and Zcash (ZEC).

We also support more than 2,000 additional digital assets, including all ERC-20 tokens on the Ethereum blockchain. Support for other tokens can be requested and is subject to technical, compliance and risk review.

10. Privacy

How we collect, use and protect personal and business information is described in our separate Privacy Policy, available at 72wgsys.com.

11. Risk Management

- **Operations:** redundant systems, disaster recovery and business continuity planning, regular staff training, vendor due diligence, and professional liability and cybersecurity insurance.
- **Markets:** diversification guidance, real-time volatility monitoring, regular stress testing and, where appropriate, hedging.
- **Cybersecurity:** firewalls, intrusion detection, endpoint protection, regular penetration testing and 24/7 monitoring.

Digital assets are volatile and their value can go down as well as up.

12. Compliance and Client Reporting

72 WG SYS LTD maintains compliance with anti-money laundering regulations, Know Your Customer requirements, securities and exchange regulations, tax reporting and withholding requirements, and data protection and privacy laws.

Clients receive 24/7 online portfolio access, monthly statements, quarterly performance reports, annual tax documentation and custom reports on request.

13. Service Incidents

If a security or operational incident affects our services, we will promptly notify affected clients, provide regular updates until it is resolved, share a summary of the preventive measures taken afterwards, and consider compensation for significant disruptions.

14. Record Keeping

We keep client, transaction and compliance records for 7 years (or longer where required by regulation), audit records for 7 years and legal documents permanently. Records are stored in encrypted systems with access limited to authorized personnel.

15. Updates

These policies are reviewed regularly to ensure continued compliance with applicable laws and regulations and to reflect best practices in the stable digital asset custody industry. The "Last updated" date above shows when they were last changed.

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