



Document No. EN 015-2025

**SOSNA GEMS INVESTMENTS INC.**

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EIN: 32-0763482

Legal Form: Corporation (Incorporated under the laws of the State of Florida)

**Document No.: EN 015/2025**

**Title: GEMS Token Redemption Terms – USD Conversion Policy**

**Date of Issue: February 15, 2025**

**Effective From: February 15, 2025**

**Prepared by: Legal Department – Digital Assets & Compliance**

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## 1. GENERAL PROVISIONS

1.1 This document outlines the binding conditions for the redemption of **GEMS Tokens** into U.S. Dollars (USD) via the infrastructure of **SOSNA GEMS INVESTMENTS INC.** (“the Company”).

1.2 All conversions are subject to the Company’s internal procedures, applicable U.S. federal and Florida state laws, and mandatory compliance with **AML/KYC** standards.

1.3 The Company reserves the right to amend these terms in response to regulatory changes or market conditions, provided that material changes are disclosed in advance.

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## 2. INITIAL PHASE REDEMPTION RESTRICTIONS

### 2.1 Lock-up Period for Private Sale Participants

- Investors who acquired tokens during the **Private Sale (Seed Round)** are subject to a **minimum lock-up period of six (6) months**.
- After 6 months, holders may redeem a **maximum of 25%** of their total token holdings per calendar month.
- Full liquidity is available **after 12 months** post-initial allocation.

### 2.2 Launch-Based Limitations on USD Redemption

- During the first 90 days post-launch, total daily redemptions will be capped at **10% of daily exchange volume** across partnered platforms.
- The **maximum redemption per investor** is **USD 250,000/month** during this initial 3-month period.
- After 90 days, standard redemption limits apply (up to **USD 1,000,000 per transaction**).

## 2.3 Vesting Model for Stability and Compliance

- 25% of tokens are unlocked upon completion of the Private Sale.
  - An additional 25% becomes unlocked after 3 months.
  - The remaining 50% will vest linearly at 10% monthly increments over the following 5 months.
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## 3. LIQUIDITY SAFEGUARDS AND ANTI-SPECULATION MECHANISMS

### 3.1 Market Stability Protocol

- The Company reserves the right to **temporarily suspend USD redemptions** if outgoing volume exceeds **20% of circulating supply** within any 7-day period.
- Suspicious activity will be reviewed under the Company's internal **AML/KYC protocols** and may be reported to authorities.

### 3.2 Fixed Conversion Rate Protection

- For redemptions exceeding **USD 500,000**, the USD conversion rate may be locked for **up to 24 hours**, based on the independently verified valuation of underlying gemstone reserves.

### 3.3 Holding Period for Private Sale Tokens Before P2P Transfer

- Tokens acquired during the Private Sale may not be listed or resold on secondary markets before 90 days, except for peer-to-peer transfers within the Company's verified investor network.
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## 4. ADDITIONAL RESTRICTIONS IN RISK SITUATIONS

4.1 USD conversion may be suspended in the event of:

- High market volatility or volume surges
- Legal/regulatory intervention
- System abuse or violation of the token policy

4.2 Redemptions exceeding **USD 1,000,000** require **individual approval** by the Company's compliance department.

4.3 In the case of policy breach, the Company reserves the right to:

- Block the user's wallet access
- Delay or reject transactions
- Report activities to **FinCEN, SEC**, or other competent regulators

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## 5. PAYMENT TERMS AND REDEMPTION LIMITS

- **Minimum redemption amount:** USD 100
- **Maximum redemption amount per transaction:** USD 1,000,000
- Funds will be credited to the verified bank account within **3 business days** of approval
- All redemptions are subject to standard **AML/KYC screening** and may be delayed for enhanced due diligence

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## 6. LEGAL FRAMEWORK AND FINAL PROVISIONS

6.1 These terms are binding upon all GEMS Token holders who seek to redeem tokens for USD through the Company's ecosystem.

6.2 **Governing Law:** The laws of the **State of Florida, United States**, shall apply exclusively to all transactions and disputes.

6.3 **Dispute Resolution:** All legal disputes shall be subject to **binding arbitration under the rules of the American Arbitration Association (AAA)**.

6.4 Redemption activity is further governed by the GEMS Token issuance terms and other related Company policies.

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**Approved on behalf of the Company:**

**Date: February 15, 2025**

**Martin Sosna**

Chief Executive Officer (CEO)

**SOSNA GEMS INVESTMENTS INC.**