



SATIS PAYBACK FRAMEWORK

Conditional and Discounted Token Settlement Framework

DOCUMENT STATUS

FINAL APPROVED PUBLIC EDITION. Payback operating status: NOT ACTIVATED. The public copy contains no approver names, signatures, stamps or identifiers.

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Finalisation of this document does not activate payback. Payback may become available only under a separate official Payback Activation Notice.

DOCUMENT CONTROL

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APPROVAL STATUS

Approval area	Status
Project owner	APPROVED
Legal	APPROVED
Compliance	APPROVED
Technical	APPROVED

Names, signatures, stamps and identifiers of approvers are not displayed in the public edition. The original signed and, where applicable, stamped approval copies are retained by SATIS Investment in a closed internal record and may be presented in original form upon an authorised request.

VERSION HISTORY

Version	Date	Description	Status
v1.0-EN	20 July 2026	First final edition approved in all four approval areas	final

KEY STATUS STATEMENT

Publication of this document does not itself activate payback, create an automatic or unconditional payment obligation, or make SAUSD or SAEUR a stablecoin. Payback may become available only under a separate official Payback Activation Notice.

1. PURPOSE OF THE DOCUMENT

The purpose of this framework is to define, in a uniform and verifiable manner, the principles of a payback process that may be activated in relation to the SAUSD and SAEUR tokens.

In particular, the document governs:

- the concept and legal nature of payback;
- the preconditions for activating payback;
- the identification of the legal entity performing payback;

- eligibility conditions;
- verification of token ownership and wallet control;
- AML/KYC and sanctions screening;
- application of the 0.75 settlement ratio;
- submission and assessment of requests;
- return transfer of tokens;
- financial performance of settlement;
- circumstances in which requests may be rejected or suspended;
- the bilateral protection of the project and token holders;
- record-keeping, data-protection and complaint-handling requirements.

2. DEFINITION OF PAYBACK

Within the SATIS system, payback is a conditional, separately activatable and discounted settlement option under which an eligible token holder may, subject to the fulfilment of specified conditions, initiate the return transfer of SAUSD or SAEUR tokens to the designated settlement address and may receive a reference-based financial settlement for the accepted token quantity.

Payback is not:

- stablecoin redemption;
- automatic redemption;
- repayment of a bank deposit;
- repayment of a credit facility or loan;
- a guaranteed investment return;
- an unconditional put option;
- a claim enforced by the smart contract;
- a continuous or unlimited token repurchase programme.

“Payback” is a SATIS Investment system term. Its use does not, by itself, determine the final civil-law, financial or regulatory classification of the arrangement.

3. NOT-ACTIVATED STATUS

Publication of this document does not mean that the payback process is operational or available.

A payback request may be submitted only if:

1. SATIS Investment has officially published a valid Payback Activation Notice;
2. the activation notice identifies the legal entity performing payback;
3. an approved financial limit is available;
4. the required legal and regulatory classification assessment has been completed;
5. the operational, banking, technical and compliance processes are available;
6. activation has been approved in all four approval areas.

In the absence of an activation notice:

- no request is required to be accepted;
- no entitlement arises;
- no settlement deadline commences;
- the 0.75 ratio may not be regarded as an open offer;
- no payment obligation arises.

4. REGULATORY ACTIVATION GATE

Payback may be activated only on the basis of a separately documented legal-classification assessment.

The assessment must address in particular:

- the crypto-asset category into which SAUSD and SAEUR may fall;
- whether payback changes the legal or economic characteristics of the tokens;
- whether the arrangement creates a redemption, payment or financial-services obligation;
- whether a crypto-asset white paper is required;
- whether authorisation, notification or registration with an authority is required;
- whether consumer-protection or investor-protection rules apply;
- which AML/KYC, sanctions, taxation and accounting conditions apply.

4.1 Risk of classification as an e-money token

Under MiCA, holders of e-money tokens have a right of redemption at par value. Accordingly, the discounted settlement ratio of 0.75 defined in this document may not be activated unchanged if, according to the competent legal or regulatory classification, SAUSD or SAEUR qualifies as an e-money token.

In that case:

- the payback model must be suspended;
- the document must be reviewed;
- the 0.75 ratio may not be applied automatically;
- applicable mandatory rules take precedence;
- new legal and compliance approval is required.

5. LEGAL ENTITY PERFORMING PAYBACK

The SATIS Investment project name does not, by itself, replace the identification of the legal entity assuming the payment obligation.

Each activation notice must state:

- the official name of the performing legal entity;
- its registration or company identification details;
- its registered office;
- its official contact address;
- the representation or signing-authority system;
- the governing law;
- the method of dispute resolution;
- the financial source of settlement;
- the maximum financial limit approved for the activation period.

Without identifying the obligated legal entity:

- an individual payback request may not be accepted;
- an individual payment obligation may not arise;
- this framework may not be interpreted as a direct promise of payment in favour of a token holder.

6. MANDATORY CONTENT OF THE ACTIVATION NOTICE

The Payback Activation Notice must contain at least:

1. the opening and closing dates of the activation;
2. the affected token: SAUSD, SAEUR or both;

3. the details of the obligated legal entity;
4. the total available financial limit;
5. the minimum and maximum quantity applicable to one applicant;
6. the allocation or ordering rule applied;
7. the accepted geographical and personal scope;
8. excluded jurisdictions;
9. required AML/KYC and sanctions checks;
10. the settlement currency;
11. applicable costs and deductions;
12. the designated official contact channel;
13. the designated token-settlement address;
14. rules governing the legal effect of the request and acceptance;
15. the targeted, but not guaranteed, payment-processing period;
16. the complaint-handling process;
17. the document identifier and version of the activation notice.

The activation notice may not retroactively amend individual settlement terms already accepted in writing, unless required by mandatory law, an authority's measure or the written agreement of the parties.

7. ELIGIBILITY CONDITIONS

An applicant may be eligible for payback only if all applicable conditions are met during the relevant activation period.

Eligibility may require, in particular:

- holding official SAUSD or SAEUR tokens;
- proof of actual control over the wallet holding the tokens;
- proof of civil-law entitlement to the tokens, where required;
- provision of complete and accurate personal or organisational identification data;
- successful completion of AML/KYC and sanctions screening;
- acceptable origin and transaction history of the tokens;
- appropriate legal capacity and capacity to act of the applicant;
- absence of an excluded jurisdiction;
- submission of required tax declarations;
- acceptance of the full framework and individual terms;
- availability of the approved token quantity;
- availability of the financial limit;
- submission of the request in the required form and within the deadline.

Mere possession of tokens does not, by itself, create automatic eligibility.

8. TOKEN HOLDING AND WALLET CONTROL

The applicant must demonstrate that it holds the tokens covered by the payback request and controls the Ethereum wallet in which they are held.

Verification may be performed, for example, by:

- a test transaction of a predetermined amount;
- secure cryptographic signing of a unique message;
- a verification transaction initiated by the applicant;

- a certificate issued by a regulated custodian;
- another documented and secure technical procedure.

SATIS Investment and the legal entity performing payback:

- do not request a private key;
- do not request a seed phrase;
- do not request a recovery phrase;
- do not request a wallet password;
- do not request direct access to the wallet.

Wallet control does not in every case prove civil-law ownership. Additional evidence may be requested in cases involving custody, agency, asset management, inheritance, legal disputes, theft or unauthorised access.

9. AML/KYC, SANCTIONS AND TOKEN-ORIGIN REVIEW

A payback applicant may be subject to identity, organisational, anti-money-laundering and sanctions checks.

The review may cover:

- identification of a natural or legal person;
- determination of beneficial ownership;
- authority to represent;
- sanctions and politically exposed person screening;
- the transaction history of the tokens;
- screening for stolen, hacked or fraud-related tokens;
- identification of high-risk service providers or addresses;
- the source of funds and tokens;
- tax residence;
- applicable geographical restrictions.

On the basis of the review, the request may be accepted, made conditional on additional documents, suspended, restricted, rejected or reported where required by law or an authority. In an AML or sanctions review, the full reasons for a decision may be restricted by law.

10. THE 0.75 SETTLEMENT RATIO

If payback has been activated and the individual request has been accepted in writing, the gross reference settlement basis is:

SAUSD

A reference amount of USD 0.75 for each accepted SAUSD.

SAEUR

A reference amount of EUR 0.75 for each accepted SAEUR.

Gross reference settlement amount = accepted whole-token quantity × 0.75 reference currency unit

Examples:

- for 1,000 accepted SAUSD, the gross reference settlement basis is USD 750;
- for 1,000 accepted SAEUR, the gross reference settlement basis is EUR 750.

The examples illustrate the mathematical operation only and do not constitute an open offer or an automatic promise of payment.

10.1 Whole-token units

SAUSD and SAEUR have 0 decimals; therefore, payback may be applied only to whole-token quantities.

A fractional token quantity:

- may not be accepted;
- may not be rounded up automatically;
- does not create a partial settlement amount.

10.2 The 25% reference difference

The 0.75 ratio represents a 25% discount relative to the token's reference unit of 1.00.

The difference:

- is not a separately deducted penalty fee;
- is not a calculation of secondary-market loss;
- is not interest or a service fee;
- does not determine the token's market price;
- forms part of the financing and development protection of the SATIS project.

The economic effect of the reference difference remains within the project's financing structure and may be managed in accordance with the applicable treasury and project-development policy. The difference does not, by itself, constitute a segregated or invariably available 25% cash fund.

11. GROSS AND NET SETTLEMENT AMOUNT

An accepted request must distinguish between:

- the gross reference settlement amount;
- mandatory statutory deductions;
- bank or transaction costs disclosed and accepted in advance;
- the net amount payable.

Only a tax or deduction required by law, a bank cost disclosed in writing in advance, the evidenced cost of an alternative payment method selected by the applicant, or another lawful item separately accepted by the parties may be deducted from the net amount.

No retrospective, undisclosed or unjustified discretionary deduction may be applied. As a general rule, the applicant bears its own Ethereum gas fees, wallet costs and bank charges unless the activation notice provides otherwise.

12. SETTLEMENT CURRENCY

As a general rule:

- the settlement currency for SAUSD payback is USD;
- the settlement currency for SAEUR payback is EUR.

Settlement in another currency may be used only where the applicant and the obligated legal entity have agreed in writing in advance and the conversion source, the time at which the exchange rate is determined, any conversion costs and the net payment amount are clearly specified.

Use of another currency does not change the secondary-market price of SAUSD or SAEUR and does not constitute an exchange-rate guarantee.

13. APPLICATION PROCESS

The principal stages of the payback process are:

1. publication of an official activation notice;
2. submission of a request through the designated official channel;
3. formal review of the request;
4. identity and compliance review;
5. verification of token holding and wallet control;
6. review of token origin and transaction history;
7. verification of financial capacity and eligibility;
8. written acceptance, conditional acceptance or rejection;
9. issue of individual token-settlement instructions;
10. return transfer of the accepted token quantity;
11. on-chain verification of the transaction;
12. performance of the financial settlement;
13. issue of a settlement record and closing notice.

Submission, automated acknowledgement, receipt or review of a request does not, by itself, constitute acceptance or create a due payment obligation. An individual obligation arises only upon documented written acceptance by the legal entity performing payback.

14. TOKEN-TRANSFER AND SETTLEMENT SECURITY

The applicant may transfer the tokens only after individual written acceptance and only to the official address specified in that acceptance.

SATIS Investment does not regard as valid payback performance a token transfer that:

- was made without approval;
- was not received at the designated address;
- was made on the wrong network;
- does not contain the accepted token quantity;
- relates to a counterfeit token or a token with another contract address;
- cannot be reliably linked to the accepted request.

The official settlement address must in every case be confirmed on the satisinvestment.com domain, in the individual acceptance document and from an official @satisinvestment.com email address.

The project never requests token transfers through unsolicited social-media messages or an unofficial website.

15. TREATMENT OF RETURNED TOKENS

SAUSD and SAEUR tokens returned under payback:

- are not automatically burned;
- do not reduce the total supply reported by the contract;
- are transferred to the designated treasury or settlement address;
- remain existing tokens on-chain.

As a general rule, returned tokens are placed in treasury reserve.

Any later reallocation, market use, transfer to a partner or other treasury transaction may take place only under a separately approved treasury policy and with appropriate public disclosure.

Payback does not constitute token burning, supply reduction or automatic permanent removal from circulation.

16. FINANCIAL CAPACITY AND LIMIT

Payback may not rely on unlimited or assumed financial capacity.

Before each activation period, the following must be determined:

- the maximum available gross financial limit;
- the currency of the limit;
- the source of funding;
- limits applicable to each applicant;
- the method of allocating the limit among requests;
- the conditions for closing or exhausting the limit.

After the limit has been exhausted, no new request may be accepted unless a separate new activation notice opens an additional limit. A submitted but not yet accepted request does not create a priority payment claim unless the activation notice expressly provides otherwise.

17. ALLOCATION OF REQUESTS

If the requested amount exceeds the available payback limit, the method to be applied must be specified in advance in the activation notice.

Possible methods include:

- the order in which complete requests are received;
- pro rata allocation;
- a maximum quantity per applicant;
- multiple settlement phases;
- another lawful method defined in advance.

The allocation method may not be changed arbitrarily with retroactive effect, must be applied consistently to applicants in equivalent situations, may not result in unlawful discrimination, and must be documented and auditable.

18. REJECTION OR SUSPENSION OF A REQUEST

A request may be rejected or suspended in particular where:

- there is no valid activation period;
- the financial limit has been exhausted;
- the request is incomplete or contains false information;
- the applicant's identity cannot be verified;
- wallet control or entitlement cannot be established;
- the tokens do not originate from the official contract;
- the tokens may be disputed, stolen or unlawfully obtained;
- an AML/KYC or sanctions obstacle arises;
- law or an authority's measure prohibits or restricts performance;
- a technical or banking obstacle exists;
- the tokens were sent before acceptance or to an incorrect address;
- the request indicates abuse or fraud;
- the applicant does not accept the individual terms;

- a force-majeure event or extraordinary operational event occurs.

A documented notice of rejection or suspension must be sent where permitted by law. Rejection does not, by itself, create a claim for damages, interest or return.

19. WITHDRAWAL OF A REQUEST

As a general rule, the applicant may withdraw the request until individual written acceptance.

After acceptance, withdrawal is possible only with the consent of the performing legal entity, before transfer of the tokens, and in accordance with the individual terms.

After the tokens have been duly returned and settlement has been completed, the payback transaction is considered final unless mandatory law or the individual agreement provides otherwise.

20. PROCESSING TIME

This framework does not establish a general payment deadline binding on every activation.

The activation notice and the individual acceptance separately specify:

- the target time for formal acknowledgement of the request;
- the expected duration of the review;
- the process for verifying token transfer;
- the target date for payment;
- possible reasons for extension.

A “target”, “expected” or “planned” date is not a guarantee unless the individual acceptance expressly establishes a binding performance deadline.

21. TAXATION AND ACCOUNTING

Payback may have tax and accounting consequences.

The applicant is responsible for:

- assessing its own tax position;
- filing required returns;
- determining the accounting treatment;
- obtaining independent professional advice where necessary.

The performing legal entity may withhold tax or another amount where required by law, request tax or residence declarations, make required reports to authorities and issue a settlement document.

SATIS Investment does not provide personalised tax or accounting advice.

22. DATA PROCESSING AND CONFIDENTIALITY

Personal, organisational, financial and blockchain-transaction data may be processed during the payback process.

Purposes of processing may include:

- identification;
- eligibility verification;
- AML/KYC and sanctions compliance;
- fraud prevention;
- token-origin review;
- financial performance;

- accounting and tax records;
- management of legal claims;
- compliance with obligations to authorities.

Detailed data-processing terms are set out in the effective SATIS Investment Privacy Notice and the activation notice. The retention period must be determined by legal, AML, accounting, tax and claims-enforcement requirements.

23. COMPLAINT HANDLING

A complaint relating to payback may be submitted through the official contact channel specified in the applicable activation notice.

In the absence of an activation notice, the official contact address for token matters is:
token@satisinvestment.com

Where possible, the complaint should include:

- the request identifier;
- the related wallet address;
- a description of the disputed decision or event;
- relevant documents;
- the requested action.

Submission of a complaint does not automatically suspend the finality of Ethereum transactions or applicable statutory obligations.

24. FORCE MAJEURE AND EXTRAORDINARY EVENTS

Activation, processing or performance of payback may be suspended where an extraordinary event materially prevents the secure or lawful execution of the process.

Such an event may include in particular:

- an extraordinary Ethereum-network event;
- a significant smart-contract or cybersecurity incident;
- failure of a banking or payment system;
- an authority's measure;
- a change in law;
- a sanction or financial restriction;
- a serious fraud or abuse event;
- failure of critical infrastructure;
- a natural disaster;
- war or another unavoidable external event.

Suspension may not be used arbitrarily to avoid obligations already accepted in writing. Existing obligations must be managed in accordance with applicable law and the individual acceptance terms.

25. BILATERAL PROTECTION

Elements protecting the token holder

- a predetermined 0.75 settlement basis;
- transparent eligibility conditions;
- documented assessment;
- a financial limit disclosed in advance;

- exclusion of hidden or arbitrary deductions;
- official token-transfer instructions;
- a complaint-handling option;
- data-protection and security rules.

Elements protecting the project

- no automatic or unlimited redemption obligation;
- operation only during a separately activated period;
- dependence on financial capacity;
- AML/KYC and eligibility checks;
- discounted settlement;
- the requested quantity may be limited;
- suspension in the event of a legal, technical or operational obstacle;
- prevention of anonymous or unverified claims.

Bilateral protection does not mean absence of risk or a guaranteed payment.

26. AMENDMENT OF THE FRAMEWORK

This document may be amended in particular following a change in law, an authority's position, a change in legal classification, a technical or security event, operational experience, a change in financial capacity, a change in banking or payment infrastructure, or a modification of a SAUSD or SAEUR system function.

An amended document receives a new version number.

An amendment:

- does not create a retroactive promise of payment;
- may not arbitrarily alter individual terms already accepted in writing;
- requires new legal, compliance, technical and project-owner approval;
- must clearly mark the previous version as archived upon publication.

27. OFFICIAL VERIFICATION POINTS

Field	Value
Official project	SATIS Investment
Official domain	satisinvestment.com
Project contact	projekt@satisinvestment.com
Token and payback contact	token@satisinvestment.com
SAUSD contract address	0x24C7A87C4a85798C9f2B33DE75e96d230388cBa7
SAEUR contract address	0x7e165e37A26d120dd21a50D7B65ED007acE26231

Only a versioned Payback Activation Notice published on the satisinvestment.com domain constitutes an official activation notice. A third party's statement, social-media post or unauthorised use of the SATIS name does not activate payback.

28. DOCUMENT VALIDITY AND REVIEW

The document must be reviewed:

- before each payback activation;
- when the obligated legal entity changes;
- when the legal or regulatory classification changes;
- before any public token offering;
- before admission to trading;

- before changing the 0.75 ratio;
- when introducing a new payment method;
- when introducing SAHYP or another token-evolution function;
- after a material technical, financial or security event;
- when a new legal or regulatory requirement enters into force.

This document does not replace any crypto-asset white paper, legal-classification opinion, authorisation, notification or regulatory registration that may be required by applicable law.

29. FINAL STATEMENT

SATIS payback is:

- conditional;
- separately activatable;
- subject to financial capacity;
- available on the basis of verified eligibility;
- a discounted settlement option;
- not automatic;
- not guaranteed;
- not 1:1 stablecoin redemption;
- not part of the SAUSD or SAEUR smart contract.

The 0.75 settlement ratio may be applied only where a valid Payback Framework, an official activation notice, an identified obligated legal entity, an available financial limit, successful eligibility and compliance checks, individual written acceptance and a proper token transfer all exist together.

This document, token holding or submission of a request does not, by itself, create an unconditional payment claim.

30. LEGAL AND PROFESSIONAL REFERENCE BASIS

The approval review took particular account of the following official sources and controlled project documents:

- Regulation (EU) 2023/1114 of the European Parliament and of the Council on markets in crypto-assets (MiCA) - <https://eur-lex.europa.eu/eli/reg/2023/1114/oj/eng>
- European Banking Authority - Asset-referenced and e-money tokens under MiCA - <https://www.eba.europa.eu/regulation-and-policy/asset-referenced-and-e-money-tokens-mica>
- SATIS Investment Official Summary v1.0 - internal controlled and public editions
- SAUSD Official Token Summary v1.0 - internal controlled and public editions
- SAEUR Official Token Summary v1.0 - internal controlled and public editions
- SATIS Investment Risk Notice v1.0 - internal controlled and public editions

APPROVAL AND PUBLIC AUTHENTICITY

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PUBLIC EDITION - APPROVED

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