BiglyPay (SynaVora FZ-LLC)

Non-Custodial AML & Risk Awareness Statement

Version: 1.0
Effective Date: 12 October 2025
Jurisdiction: Ras Al Khaimah Economic Zone (RAKEZ), United Arab Emirates

1. Company Overview
SynaVora FZ-LLC, operating under the trade name BiglyPay, is a UAE-registered software development company that provides a blockchain-based transaction monitoring and payment notification platform for merchants.

BiglyPay is a purely software-as-a-service (SaaS) provider:
- It does not store, hold, transfer, exchange, or convert any crypto-assets or fiat currency.
- It does not generate wallet addresses or take possession of private keys.
- All wallets used are fully owned, managed, and controlled by the merchant.

2. Non-Custodial Nature
BiglyPay’s system monitors blockchain activity using public APIs and reports confirmed transactions to merchants via secure callbacks. At no point does BiglyPay have control or access to customer funds. The system operates entirely off-chain and only provides blockchain data analytics and automation for merchants.

3. AML/CFT Awareness
While BiglyPay does not conduct financial or custodial services, the company maintains an internal awareness policy to ensure that its software and services are not misused for illegal purposes. We are committed to cooperating with licensed partners, exchanges, and regulatory authorities in case of lawful AML or sanctions inquiries.

4. Sanctions & Risk Awareness
BiglyPay is aware of global AML/CFT frameworks, including the UAE Federal Decree-Law No. (20) of 2018, Cabinet Decision No. (10) of 2019, and Cabinet Decision No. (111) of 2022. We use blockchain monitoring APIs capable of screening known sanctioned or high-risk wallet addresses when applicable.

5. Statement of Compliance
BiglyPay reaffirms that it does not qualify as a Virtual Asset Service Provider (VASP) under UAE law and does not fall under direct AML licensing obligations. Nonetheless, we uphold transparency, due diligence cooperation, and responsible software use principles.

Company: SynaVora FZ-LLC (RAKEZ, UAE)
Brand: BiglyPay
Prepared by: Compliance Department
Approved by: Management Board
Date: 12 October 2025